



STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
MARLENE J. FLUHARTY  
STEPHEN V. MONSMA  
STEWART MYERS  
DAVID D. OLSON  
RAYMOND POUPORE  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

RONALD O. SKOOG, Director

November 8, 1985

RECEIVED  
NOV 12 1985  
SOLID WASTE BRANCH  
U.S. EPA, REGION V

Ms. Edith M. Ardiente, P.E., Chief  
Technical Services Section  
U.S. EPA - Region V  
230 South Dearborn, 5HS-13  
Chicago, Illinois 60604

Re: Stanley Tools  
MID099124299

Dear Ms. Ardiente:

As requested, I have performed a technical evaluation of the closure plan for the above referenced facility. As stated in my letter of October 1, 1985, the closure plan was not received until September 27, 1985. Due to the stage of review and the company's willingness to start closure operations, my review comments were given to Rick Traub over the telephone. I am submitting my comments, in writing, now to clarify any work credit questions.

The Michigan Department of Natural Resources recommends approval of the closure plan. If you have any questions concerning this matter, please contact me.

Sincerely,

James D. Roberts  
Environmental Engineer  
Technical Services Section  
Hazardous Waste Division  
517-373-2730

cc: Mr. Ken Burda/C & E File  
Mr. R. Traub, U.S. EPA - Region V  
Ms. M. Murphy, U.S. EPA - Region V

223-90

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
ARLENE J. FLUHARTY  
EPHEN V. MONSMA  
STEWART MYERS  
DAVID D. OLSON  
RAYMOND POUPORE  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

RONALD O. SKOOG, Director

RECEIVED

OCT 07 1985

SOLID WASTE BRANCH  
U.S. EPA, REGION V

October 1, 1985

Richard Traub, Geologist  
U.S. EPA Region 5, 5HS-13  
230 South Dearborn Street  
Chicago, Illinois 60604

RE: Stanley Tools Division  
MID 099 124 299

Dear Mr. Traub:

In a letter from Edith Ardiente it is was requested that the MDNR perform a technical review of the closure plan for the above referenced facility. The review was to be completed by September 9, 1985. The closure plan was received in this office on September 27, 1985, making the review by September 9, 1985 impossible. We are requesting that the review date be extended to October 11, 1985.

If you have any questions concerning this matter, please contact me.

Sincerely,

James D. Roberts  
Environmental Engineer  
Technical Services Section  
Hazardous Waste Division  
(517) 373-2730

cc: K. Burda/C+E File  
M. Murphy, U.S. EPA Region 5

223-84



FULL/PARTIAL INTERIM STATUS CLOSURE/POST CLOSURE  
INFORMATION NEEDED BY INFORMATION UNIT

9/30/85

1. U.S. EPA ID NUMBER MID 099 124 399
2. FACILITY NAME Stanley Tools
3. PROCESS CODES BEING CLOSED TO2, S04
4. FULL OR PARTIAL CLOSURED Full
5. IF FULL CLOSURE, NEW STATUS
  - . GENERATOR X
  - . TRANSPORTER
  - . CLOSED
6. RESPONSIBLE AGENCY DSEPA
7. ACTUAL DATES FOR THE FOLLOWING EVENTS:
  - . CLOSURE PLAN RECEIVED 4/1/85
  - . PUBLIC NOTICE OF CLOSURE 6/5/85, 9/11/85
  - . CLOSURE PLAN APPROVED 9/27/85
  - . OWNER/OPERATOR AND PE CERTIFICATION RECEIVED
  - . SITE INSPECTION

223-92

PS Form 3811, July 1983 447-845

**SENDER: Complete items 1, 2, 3, and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:

MS. DELIA M. CHRISTENSEN  
STANLEY LABORATORY  
1309 CORBIN AVENUE  
NEW BRITAIN, CONNECTICUT 06053

4. Type of Service:

- |   |                                  |
|---|----------------------------------|
| <input type="checkbox"/> Registered           | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD     |
| <input type="checkbox"/> Express Mail         |                                  |

Article Number

P 099 124 299

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee

X

6. Signature - Agent

X

7. Date of Delivery

OCT 3 1985

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT



5HS-13:WMD:SWB:TPS:MI UNIT:  
R. TRAUB:STANLEY TOOLS - FOWLerville

**UNITED STATES POSTAL SERVICE**  
**OFFICIAL BUSINESS**

**SENDER INSTRUCTIONS**

- Print your name, address, and ZIP Code in the space below.
- Complete items 1, 2, 3, and 4 on the reverse.
  - Attach to front of article if space permits, otherwise affix to back of article.
  - Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE USE, \$300

**RETURN  
TO**



United States  
Environmental Protection Agency  
Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

MID 099 124 299

P# 099 124 299

**SEP 27 1985**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Delia M. Christensen  
 Chief Chemist,- Environmental Science  
 Stanley Laboratory  
 1309 Corbin Avenue  
 New Britain, Connecticut 06053

RE: Closure Plan  
 Stanley Tools - Fowlerville  
 MID 099 124 299

Dear Ms. Christensen:

We have reviewed the closure plan dated March 27, 1985 and the revisions to the plan dated September 20, 1985. These plans are hereby approved subject to the conditions described in the enclosure to this letter. Please be aware that closure does not terminate interim status. A corrective action order may be issued to your facility, if the United States Environmental Protection Agency determines that a release of hazardous waste or hazardous waste constituents is taking or has taken place.

When closure is completed, please submit the certification required by 40 CFR 265.115.

If you have any questions, please contact Mr. Richard Traub of my staff, at (312) 886-6138.

Sincerely,

Basil G. Constantelos, Director  
 Waste Management Division

cc: Alan J. Howard, MDNR w/enclosure  
 John Bohunsky, MDNR w/enclosure

bcc: HWDMS Update File

5HS-13:WMD:SWB:TPS:MI:R.Traub:G.Words:FINAL TYPING:9/24/85

	TYP.	AUTH.	IL CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	TPS CHIEF	WMB CHIEF	WMD DIR
INIT. DATE	<i>J.H.</i> 9/25/85	<i>R.S.</i> 9/26/85			<i>Am</i> 9/25/85			<i>OK</i> 9/26/85	<i>OK</i> 9/26/85	<i>RE</i> 9/27

223-86

STANLEY TOOLS - FOWLERVILLE  
MID 099 124 299

CLOSURE PLAN APPROVAL  
CONDITIONS

1. As of May 8, 1985 the placement of bulk or non-containerized liquid hazardous waste in a landfill is prohibited, even if absorbents have been added. The waste must be stabilized or treated and solidified by other means, prior to its off-site disposal in a landfill.
2. Submit the following within 10 days of determination:
  - grid sampling pattern
  - grid sample point concentrations
  - results of statistical comparison between grid point values and background.

YELLOW  
J.W. Hawks



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:  
5HS-13

AUG 20 1985

Mr. Alan J. Howard, Chief  
Technical Services Section  
Hazardous Waste Division  
Michigan Department of Natural Resources  
P.O. Box 30028  
Lansing, Michigan 48909

RE: Closure Plan

Stanley Tools  
Fowlerville  
MID 099 124 299

Dear Mr. Howard:

~~Under separate~~ <sup>revised</sup>  
~~Enclosed is/are~~ cover you have received copy(s) of a closure plan for the  
referenced facility. Please perform a technical evaluation of the plan, and  
provide us your comments by September 9, 1985.

If you have any questions on the closure plan, please contact Rich Traub  
of my staff, at (312) 886-6138.

Sincerely,

*Edith M. Ardiente*

Edith M. Ardiente, P.E.  
Chief, Technical Programs Section

Enclosure(s)

cc: Mary Higgins  
HWDMS Update File

	TYP.	ADMT.	L. CHIEF	BL. CHIEF	ML. CHIEF	ADM./M. CHIEF	CH. CHIEF	TPS CHIEF	WHD CHIEF	W. CHIEF
INT. DATE	J.W. 8/20/85	8/20/85			Am 8-20-85					

223-81

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
EILENE J. FLUHARTY  
PHEN V. MONSMA  
STEWART MYERS  
DAVID D. OLSON  
RAYMOND POUPORE  
HARRY H. WHITELEY

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

RONALD O. SKOOG, Director

RECEIVED

JUL 23 1985

SOLID WASTE BRANCH  
U.S. EPA, REGION V

July 17, 1985

Mr. Richard Traub  
Technical Programs Section  
U.S. EPA - Region V  
5HS-13  
230 S. Dearborn Street  
Chicago, Illinois 60604

RE: Stanley Tools Division  
Fowlerville, MI

Dear Mr. Traub:

Although a notice of deficiency for the Stanley Tools closure plan has been sent to Edith Ardiente under separate cover, I would like to take this opportunity to re-emphasize some issues.

At a meeting held July 9, 1985, attended by Delia Christensen and A.M. Stock, of Stanley Tools, and Dave Slayton and me, of the MDNR, Stanley Tools raised questions regarding to the use of the EP Toxic extraction procedure and "how clean is clean." My recommendation to you, since the final closure plan is approved through your office, is as follows:

1. The facility should use the test for total metals rather than the EP Toxic test.
2. The facility should use the Student T-test with a 95% confidence level in comparing background levels.
3. The facility should take at least two background samples from the area recommended by the MDNR in our July 9 meeting. This is in the northeast corner of the surface impoundment area.

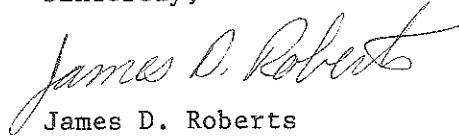
223-76

Mr. Traub  
July 17, 1985  
Page 2

The company has emphasized that they want to be able to close the surface impoundments before the end of this construction season. This means getting the closure plan approved soon, since the construction season in Michigan runs approximately through the first of November.

If you have any questions concerning this matter, please contact me.

Sincerely,



James D. Roberts  
Environmental Engineer  
Technical Services Section  
Hazardous Waste Division  
517-373-2730

cc: Lansing District Office, HWD  
Dave Slayton, HWD  
Ken Burda, HWD  
C&E File

JUL 08 1985

SHS-13

Certified Mail  
Return Receipt Requested

Ms. Delia M. Christensen  
Chief Chemist-Environmental Science  
Stanely Laboratory  
1309 Corbin Avenue  
New Britain, Connecticut 06053

RE: Closure Plan  
Stanely Tools-Fowlerville  
MID 099 124 299

Dear Ms. Christensen:

The United States Environmental Protection Agency has reviewed the closure plan for the above referenced facility and determined that it is inadequate and is hereby disapproved. You are to provide a revised closure plan, addressing the deficiencies described in the enclosure to this letter, to this office by August 15, 1985. Also, provide a copy of the revised plan to the Michigan Department of Natural Resources, Technical Services Section, of the Hazardous Waste Division in Lansing, as they are assisting in the review.

If you have any questions regarding the plans, please contact Richard Traub of my staff, at (312) 886-6138, for assistance.

Sincerely,

Edith M. Ardiente, P.E.  
Chief, Technical Programs Section

8/2/85

	TYP.	AUTH.	H.	IN.	MI.	MIN/WI.	OH.	TPS	WMB	WI
INIT. DATE	4/21/85	R. Traub			Chief	Chief	Chief	Chief	Chief	Chief

Enclosure

cc: Alan J. Howard, MDNR w/enclosure  
John Bohunsky, MDNR w/enclosure

bcc: HSDMS Update File

SHS-13:SNB:TPS:MI:R.Traub:Gen:FINAL:07/02/85

223-75

1. Specify the SH-846 methodology and how it will be applied to the number and location of samples to be collected, referred to in #8 on page 7. Methodology for setting up a sampling grid and sampling points should be comparable to the Michigan Department of Natural Resources "How clean is clean" guidance which you have already received.
2. In order to comply with 40 CFR 265.229(b) it must be demonstrated that all hazardous waste and its residues have been removed. Therefore a total metals analysis of the soils is appropriate to determine depth and extent of removal. Background levels should be established from no less than 4 points for at least cadmium, nickel, chromium, cyanide, and the primary drinking water inorganic parameters. Concentration levels of lagoon soil samples will then be compared to background levels using an appropriate statistical method. Specify sampling, analysis and statistical methods to be used.
3. Describe procedures for decontamination of equipment used during closure. Include procedures for determining that equipment is clean, and for control of wash water and contaminated soil during decontamination.
4. Provide a description of the licensed professional engineers inspection duties and any reports which will be generated.

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

RONALD O. SKOOG, Director

May 28, 1985

RECEIVED

JUN 07 1985

SOLID WASTE BRANCH  
U.S. EPA, REGION V

Ms. Edith M. Ardiente, P.E.  
Chief, Technical Programs Section  
U.S. EPA - Region V  
5HS-13  
230 South Dearborn St.  
Chicago, Illinois 60604

Re: Stanley Tools Division  
MID 099 124 299

Dear Ms. Ardiente:

As requested in your letter dated May 1, 1985 I have performed a technical evaluation of the closure plan for the above referenced facility. Attached is a notice of deficiency for Stanley Tools Division.

If you have any questions concerning this matter please contact me.

Sincerely,

James D. Roberts  
Environmental Engineer  
Technical Services Section  
Hazardous Waste Division  
517-373-2730

cc: R. Traub, U.S. EPA - Region V  
M. Higgins, U.S. EPA - Region V  
L. Vahovick, HWD - Lansing  
K. Burda, HWD  
C&E File

223-73

Notice of Deficiency  
Stanley Tools Division  
MID 099 129 299  
Fowlerville, MI

1. According to 40 CFR 265.112(a)(3) and 265.114 the closure plan must provide a description of steps for the decontamination of the facility. The decontamination procedures for the surface impoundments should include steps for the removal of any contaminated subsoils and the cleanup of any contaminated groundwater which remains after the sludge is deposited as a hazardous waste. To ensure the facility is clean the plan must include a procedure such as the State of Michigan, Department of Natural Resources, Hazardous Waste Division's draft copy of "How Clean is Clean." This document details a method for setting up a grid system in conjunction with a systematic random sampling method. A copy has been included with this letter.
2. As described in 40 CFR 265.111 and 265.228 the facility must remove all contaminated soils and residues or include the post closure requirements. The facility must also take into consideration the implications of the new RCRA amendment pertaining to prior releases. There is evidence of contaminated groundwater and surface water at the facility which is considered waste residue subject to cleanup.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

Yellow

REPLY TO THE ATTENTION OF:

5HS-13

MAY 01 1985

Mr. Alan J. Howard, Chief  
Technical Services Section  
Hazardous Waste Division  
Michigan Department of Natural Resources  
P.O. Box 30028  
Lansing, Michigan 48909

RE: Closure Plan

Stanley Tools Division  
Howlandville  
MI 099 124 299

Dear Mr. Howard:

Under separate cover  
Enclosed is/are you have received a copy(s) of a closure plan for the  
referenced facility. Please perform a technical evaluation of the plan, and  
provide us your comments by June 10, 1985.

If you have any questions on the closure plan, please contact Rich Traub  
of my staff, at (312) 886-6138.

Sincerely,

*Edith M. Ardiente*

Edith M. Ardiente, P.E.  
Chief, Technical Programs Section

Enclosure(s)

cc: Mary Higgins  
HWDMS Update File

INITIALS	DATE	TYPYST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TFS CHIEF	WMB CHIEF	WMD DIRECTOR
		<i>g.w.</i>	<i>R. Traub</i>			<i>MI</i> <i>5-1-85</i>			
		<i>5-1-85</i>	<i>5/1/85</i>						

223-69

SFL-5

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

March 29, 1985

(203) 225-5111

Mr. Richard Traub  
USEPA Region V  
230 South Dearborn St.  
Chicago, Illinois 60604

Att: 5 HW-13

RECEIVED  
APR 1 1985  
WASTE MANAGEMENT  
BRANCH

Dear Mr. Traub:

Stanley Tools - Fowlerville is submitting the enclosed closure plan in lieu of completing the Part B permit. We will be closing the lagoons as storage impoundments under interim status regulations.

As you know, we are committed to completing closure in 1985. This timetable mandates initiation of closure by October 1st at the latest and with EPA/DNR's permission, an earlier schedule would be desirable to avoid the problems associated with the onset of cold weather.

A copy of the attached material has also been submitted to the Michigan Department of Natural Resources.

Thank you for your prompt attention in this matter.

Sincerely yours,

*Delia M. Christensen*

Delia M. Christensen  
Chief Chemist - Environmental Science  
Stanley Laboratory  
1309 Corbin Avenue  
New Britain, CT 06053

CC: Mr. Alan Howard,  
MDNR

jzz

223-63

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

January 17, 1985

RECEIVED  
JAN 21 1985

WASTE MANAGEMENT  
BRANCH

Mr. Richard Traub  
Technical, Permits and Compliance Section  
United States Environmental Protection Agency  
Region V  
230 South Dearborn St.  
Chicago, Illinois 60604

Dear Mr. Traub:

This letter will confirm our discussion held at the USEPA Region V Office 1/8/85 and your subsequent telephone call of 1/9/85 regarding the status of Stanley Tools-Fowlerville Part B Application.

The Stanley Works is in receipt of a notice of deficiency dated 12/5/84 with a 1/25/85 response deadline. As we discussed, The Stanley Works is presently considering closure of the surface impoundments as an alternative to the continuation of the Part B Permit Process. By virtue of this letter, I am requesting an extension for the submittal of information pertaining to the notice of deficiency. I will be in contact with you by February 15, 1985 to advise you of our position.

In our discussions of closure, you indicated that the regulated units could be closed as storage impoundments under 40 CFR 265 Standards. We would need to submit a closure plan to Region V in accordance with 40 CFR 265.112 one hundred eighty days prior to the closure start date. It is my understanding that the EPA in conjunction with the Michigan DNR, would review and comment on the closure plan. The closure plan would then go to public notice and subsequent approval by both the EPA and DNR would be issued within ninety days of submittal. Until such time as closure was initiated, the Fowlerville facility would continue under its present groundwater monitoring assessment plan and would be responsible for all other items within the interim status regulations.

223-60

In evaluating a clean standard for soil contamination within 40 CFR 265.228, you indicated an acceptance of the EP Toxicity Test for those metals incorporated in the F006 listing. In addition, nickel and cyanide would also be evaluated utilizing the extraction procedure with clean standards as discussed in a recent memorandum. To facilitate our review of this option, I would appreciate a copy of that memorandum at your earliest convenience.

Should we proceed with a storage impoundment closure under 265 Standards, it is my understanding that certification must be supplied to Region V that closure is complete. The Fowlerville facility will then operate under the wastewater treatment exclusion permit by rule and will be regulated by Region V as a generator of hazardous waste. Interim status would be terminated and should this facility wish in the future to be considered as a TSDF, a full permit application would be required.

Although we discussed closure of the impoundment as a disposal unit under 265 Standards during our meeting, you indicated in our telephone conversation of 1/9/85 that this type of closure would, in fact, be covered under a post-closure permit. In that case, the Stanley Tools-Fowlerville facility would be required to substantially complete the Part B Permit Process including the outstanding notice of deficiency prior to the issuance of a post-closure permit. However, you indicated that actual closure could begin utilizing the 265 Closure and Post-Closure Plan that was patterned after the 264 Standards with the permit to follow at a later date.

In the event that the above information does not accurately reflect EPA's position regarding closure, please contact me at the Stanley Laboratory since we are anxious to resolve this issue as expeditiously as possible.

Sincerely yours,



Delia M. Christensen  
Chief Chemist - Environmental Science  
Stanley Laboratory  
1309 Corbin Avenue  
New Britain, CT 06053  
(203) 225-5111 - Ext. 5211

February 29, 1984

Mr. Albert M. Stock  
Plant Engineer  
Stanley Tools - Div. of Stanley Works  
425 Frank Street  
Fowlerville, Michigan 48836

MIB 099 124299

Dear Mr. Stock:

As part of our FY84 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, we are obligated to review the adequacy of the closure and post-closure plans for all major hazardous waste treatment, storage and disposal facilities (TSDFs) in the state. All TSDFs which are licensed under 1979 PA 64, as amended, and those which are subject to the RCRA Part 264/265, Subpart F groundwater monitoring requirements, are defined as a major facility. EPA and the Department have also identified additional "major" facilities on the basis of the type and quantity of waste treated, generated or disposed of.


Your facility is considered a "major" facility. Therefore, please submit two up-to-date copies of your closure and post-closure plans for your hazardous waste storage and surface impoundment by March 21, 1984.

The plans should be sent to the following address:

Hazardous Waste Division  
Michigan Department of Natural Resources  
P.O. Box 30038  
Lansing, Michigan 48909

If you have questions regarding this letter, please contact Mr. Alan Howard, Chief of our Technical Services Section, at (517) 373-2730.

Sincerely,

  
Delbert Rector, Chief  
Hazardous Waste Division  
(517) 373-2730

pQuackenbush/vla  
cc: U.S. EPA  
District/Bob Basch

**STANLEY**

# STANLEY TOOLS

DIVISION OF THE STANLEY WORKS

425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836

(517) 223-9154

April 12, 1983

Mr. Michael Mutnan  
Region V  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Ill. 60604

Re: Addendum change to the Contingency Plan.

Dear Sir:

In my letter of March 31, 1983 a proposal was offered for your perusal relative to closure cost, closure schedule and soil sampling.

You registered concern as to the area we had proposed to take samples for background or upgradient soil samples. In review we agree the proposed area could leave some question as to the soil quality which would be used for background information.

Therefore, we are submitting a revised drawing dated April 12, 1983 which will depict the new location of the background sample site. The language in Section VIII Soil Sampling will be changed to reflect this new location.

I trust this new location meets with your approval.

Sincerely,



A. M. Stock  
Mgr. Plant Eng./Envir. Control

AMS/alk

Enc.

WASTE MANAGEMENT  
BRANCH

RECEIVED  
APR 18 1983



#### VI. Closure Cost

The closure cost estimate was prepared on November 1, 1981.

The closure cost for 1981 was estimated at \$183,000.

The updated estimated closure cost for November 1982 is \$193,980.

As required these estimates will be reviewed annually.

#### VII. Closure Schedule

- (a) The estimated date for lagoon closure is September 1, 1985.
- (b) Notification of closure which requires submission of the closure plan will take place on or before March 1, 1985.
- (c) All waste material will be removed on or before December 1, 1985.
- (d) Equipment will be decontaminated and lagoons will be back filled with non-contaminated soil on or before March 1, 1986.
- (e) The area which has been backfilled will be graded and seeded for ground cover when weather conditions permit.

#### VIII. Soil Sampling

To insure adequate material has been removed from the lagoon area so as to render the sub soil non-contaminated soil samples will be taken and analyzed.

Soil samples will be taken to establish background information of soil quality. Soil samples will also be taken from the mid-point of each lagoon. The depth at which the soil samples are taken will be determined from a common bench mark to insure samples are taken from the same level.

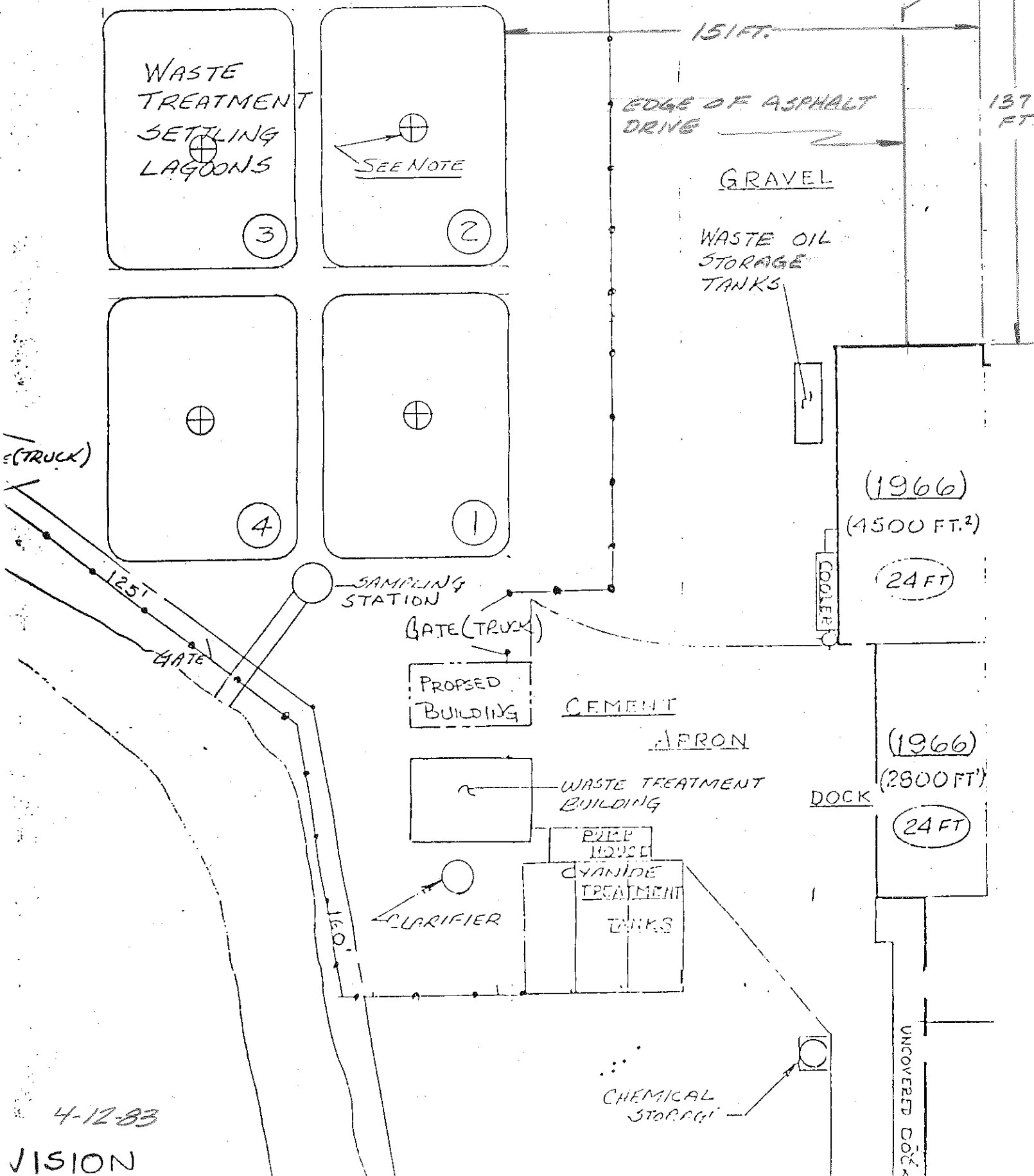
Attached is a sketch which depicts the areas described.



NOTE:

LOCATION FOR LAGOON SOIL  
SAMPLES TO BE TAKEN

LOCATION FROM WHICH  
BACKGROUND SOIL  
SAMPLES WILL BE TAKEN



**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

April 14, 1986

U.S. Environmental Protection Agency  
Waste Management Division  
230 South Dearborn Street  
Chicago, Illinois 60604

RE: ID MID099124299

Dear Sir:

Mr. John Oster of PRC Engineering, Chicago, Illinois visited the Stanley Tools - Fowlerville facility regarding loss of interim status notification.

The surface impoundments at Stanley Tools Fowlerville went into closure on October 7, 1985 under the enclosed closure plan approval.

Mr. Richard Traub of your staff indicated that since we were already in closure we did not have to respond to the November information requirements.

This facility was in compliance with groundwater and financial responsibility requirements but was not pursuing the permit because the regulated units were already in closure.

If there are additional questions please contact me at the Stanley Laboratory.

Sincerely yours,



as

Delia M. Christensen  
Stanley Laboratory  
1309 Corbin Avenue  
New Britain, Connecticut 06053

5. Page 12, Paragraph 2, indicates that soil borings will be drilled in the excavation bottom using a bucket auger and split-spoon sampler. The plan should indicate how the split spoon sampler will be driven, i.e. drill rig, etc.

6. Page 13, Paragraph 1, indicates that liquids and solids excavated will be categorized by pH. The plan should specify the procedure to be used in making these determinations.

The following relate specifically to Appendix B, Health and Safety Plan Amendment:

1. Table 4 fails to address protective equipment requirements for activities other than soil sampling, i.e. pumping of contaminants, excavation, etc. In addition, clarification is needed regarding respiratory protection. Specifically, clarify the types and combinations of respirator cartridges to be utilized, i.e. a dust/mist filter is generally associated with a combination cartridge.

2. Table 5 and Table 6 identify monitoring frequency to be required for soil sampling. An additional column should be added to Table 5 which describes such frequencies in greater specificity than what currently is provided.

3. Table 5 indicates that detector tubes will be used for cyanides, however there is no indication as to whether or when cyanide tubes will be used. In addition, Table 6 indicates that detector tubes will be used based upon HNu readings. HNu readings may not be utilized for such determinations. Therefore, these tables should be revised to specify appropriate monitoring for cyanides.

4. Table 5 which discusses explosive atmosphere sampling should specify that low areas be monitored within or adjacent to the work area and that the action levels should be based upon readings in such areas.

5. Table 5 indicates that a CGI is to be used to monitor for explosive atmospheres and that readings obtained from a CGI in an oxygen deficient or enriched atmosphere are invalid. If an oxygen level other than normal is credible, then monitoring for oxygen should be specified. Corresponding action levels should also be provided.

A revised plan incorporating these comments should be sent to Glenn Starnard, RCRA Enforcement Branch (5HR-12), U.S. EPA, Chicago, Illinois 60604-1505,

within 28 days of receipt of this letter. If you should have any questions regarding this matter, please contact Glenn Starnard of my staff. His telephone number is (312) 886-4582.

Sincerely yours,

Kevin M. Pierard, Acting Chief  
RCRA Enforcement Branch

Enclosures

cc: William J. Guerrera, The Stanley Works  
David Slayton, MDNR

bcc: Felipe Gomez, 5CS-TUB-3

WEM:gjs:disc1\stantool\drum.

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	gc 3/27/91	LLP 3/27/91	JP 4/4/91



**STANLEY**

# STANLEY TOOLS

DIVISION OF THE STANLEY WORKS

425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836

(517) 223-9154

March 31, 1983

Mr. Michael Mutnan  
Region V  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Ill. 60604

RECEIVED  
MAR 31 1983

WASTE MANAGEMENT  
BRANCH

Dear Sir:

Enclosed is an addendum which will be inserted into the facility closure plan.

This procedure is offered for your perusal and hopefully your concurrence.

Should there be any questions please contact me.

Sincerely,



A. M. Stock  
Mgr. of Plant Eng./Envir. Control

AMS/alk

Enc.



— WORK SAFELY WITH HAND TOOLS — WEAR SAFETY GOGGLES —

#### VI. Closure Cost

The closure cost estimate was prepared on November 1, 1981.

The closure cost for 1981 was estimated at \$183,000.

The updated estimated closure cost for November 1982 is \$193,980.

As required these estimates will be reviewed annually.

#### VII. Closure Schedule

- (a) The estimated date for lagoon closure is September 1, 1985.
- (b) Notification of closure which requires submission of the closure plan will take place on or before March 1, 1985.
- (c) All waste material will be removed on or before December 1, 1985.
- (d) Equipment will be decontaminated and lagoons will be back filled with non-contaminated soil on or before March 1, 1986.
- (e) The area which has been backfilled will be graded and seeded for ground cover when weather conditions permit.

#### VIII. Soil Sampling

To insure adequate material has been removed from the lagoon area so as to render the sub soil non-contaminated soil samples will be taken and analyzed.

Soil samples will be taken within a 10 foot radius of our present up gradient well currently used for ground water monitoring. Soil samples will also be taken from the mid-point of each lagoon. The depth at which the soil samples are taken will be determined from a common bench mark to insure samples are taken from the same level.

Attached is a sketch which depicts the areas described.



SOIL SAMPLES TO BE TAKEN

WASTE  
TREATMENT  
SETTLING  
LAGOONS

SEE NOTE

GRAVEL

WASTE OIL  
STORAGE  
TANKS

LUGRADIENT WELL

FATE (TRUCK)

1251

GATE

SAMPLING  
STATION

GATE (TRUCK)

PROPOSED  
BUILDING

CEMENT

APRON

-WASTE TREATMENT  
BUILDING

PUMP  
HOUSE

CYANIDE  
TREATMENT  
TANKS

## CLARIFIER

CHEMICAL  
STORAGE

(1966)

(4500 FT.<sup>2</sup>)

24 FT)

(1966)

(2800 FT)

24 FT.

DOCK

UNCOVERED DOCK

DIVISION

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

RECEIVED

SEP 23 1985

SWB - AIS  
U.S. EPA, REGION V

RECEIVED

(203) 225-5111

MAR 29 1985

SOLID WASTE BRANCH  
U.S. EPA, REGION V

September 20, 1985

Ms. Edith M. Ardiente  
Chief, Technical Programs Section  
United States Environmental Protection Agency  
Region IV  
230 South Dearborn Street  
Chicago, IL 60604

RECEIVED

SEP 22 1985

SEP 23 1985

SOLID WASTE BRANCH  
U.S. EPA, REGION V

Re: Closure Plan  
Stanley Tools - Fowlerville  
MID 099 124299

Dear Ms. Ardiente:

Attached please find response to your request for additional information on the above referenced closure plan. These items are submitted as an addendum to the original plan.

As discussed with Mr. Richard Traub of your staff, the delay in submission was caused by a delay in receipt of the background soil analytical data.

If you have any questions please contact me at the Stanley Laboratory.

Sincerely,

THE STANLEY WORKS

*Delia M. Christensen*

Delia M. Christensen  
Stanley Laboratory  
1309 Corbin Avenue  
New Britain, CT 06053

dw

COPY 2

223-91

Addendum to Closure Plan

Stanley Tools - Fowlerville

MID 099 124 299

1. Samples will be obtained from the excavated impoundments in the following manner:
  - A. A grid system will be established over the specified closure area using the following formula:

$$GI = \sqrt{\frac{A \pi}{GL}}$$

Where: GL = length of area to be gridded

A = area to be gridded (ft<sup>2</sup>)

GI = grid interval

Sampling format will follow systematic random sampling method as referenced in SW-846, Section 1.1.3.3

2. Attached please find background soil analysis report completed by Swanson Environmental. Soils were collected from 3 borings located near Background Groundwater Monitoring Well 7. Background will be established for each soil horizon.

After Background is established contamination will be determined using a Student T-Test at the 95% level of confidence.

3. Decontamination will include a truck and equipment washing facility. This area will be on black-top and will be bermed. Wash waters will be collected with a sandpiper pump and tested for pH, heavy metals and cyanide to insure adequate rinsing. Wash waters will be directed to take on-site treatment facility for processing.

Suspected contaminated soil will be tested in the same fashion as the lagoon bottom. Soils showing evidence of contamination will be handled at an off-site interim status or permitted disposal facility.

Addendum to Closure Plan

Stanley Tools - Fowlerville

MID 099 124 299

Page 2

4. The licensed professional engineer will inspect the site:
  - A. After removal of all liquid waste/sludge from the impoundment to insure proper placement of sampling points.
  - B. The engineer will be on-site while samples are being obtained to verify sampling position on grid and chain of custody.
  - C. Engineer will supervise backfilling operation to insure proper fill material, grading and cover has been established.
  - D. At the completion of the closure a report will be issued detailing the procedures followed and certification that the facility was closed in accordance with the approved closure plan.

**SWANSON ENVIRONMENTAL INC.**

**ORIGINAL**



Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

REPORT NUMBER B 2532

**ANALYTICAL REPORT**

SHIP TO  
Swanson Environmental, Inc.  
24158 Haggerty Road  
Farmington Hills, MI 48024  
Atten: Steve Ridella

DATE August 20, 1985  
PURCHASE ORDER NO. \_\_\_\_\_  
SEI JOB NO. ME3168/L3800  
DATE COLLECTED 7-31-85  
DATE RECEIVED 8-05-85  
PAGE 1 OF 5

**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-1 BGI-1/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		4.5	4.8	4.8	4.8
Cadmium, mg/kg		1.9	1.6	1.8	1.5
Chromium, mg/kg		8	8	8	8
Copper, mg/kg		10	10	10	11
Lead, mg/kg		21	21	21	21
Nickel, mg/kg		21	20	19	20
Zinc, mg/kg		101.5	100.9	101.1	101.2
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-2 BGI-2/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		3.4	3.3	3.4	2.9
Cadmium, mg/kg		1.4	1.5	1.8	1.8
Chromium, mg/kg		11	10	10	9
Copper, mg/kg		13	14	13	14
Lead, mg/kg		23	23	23	23
Nickel, mg/kg		24	22	23	23
Zinc, mg/kg		177.9	179.5	178.9	178.9
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher*  
James Kinscher  
Chemist

*N. Crabb*  
Norman Crabb, Ph.D.  
Director

**SWANSON ENVIRONMENTAL INC.**
**ORIGINAL**


Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

**REPORT NUMBER B 2532**
**ANALYTICAL REPORT**

SHIP TO: Swanson Environmental, Inc.  
24158 Haggerty Road  
Farmington Hills, MI 48024  
  
Attn: Steve Ridella

DATE August 20, 1985  
PURCHASE ORDER NO. \_\_\_\_\_  
SEI JOB NO. ME3168/L3800  
DATE COLLECTED 7-31-85  
DATE RECEIVED 8-05-85  
PAGE 2 OF 5

**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-3 BGI-3/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		5.3	5.4	5.4	5.2
Cadmium, mg/kg		2.5	2.2	2.5	2.5
Chromium, mg/kg		16	16	16	16
Copper, mg/kg		22	23	23	23
Lead, mg/kg		29	29	29	29
Nickel, mg/kg		38	38	37	38
Zinc, mg/kg		259.6	261.3	260.4	261.3
Cyanides, Total, mg/gk		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-4 BGI-4/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		2.1	2.2	2.2	2.1
Cadmium, mg/kg		1.6	1.4	1.1	1.3
Chromium, mg/kg		<4	<4	<4	<4
Copper, mg/kg		6	6	6	7
Lead, mg/kg		14	14	14	14
Nickel, mg/kg		12	10	11	11
Zinc, mg/kg		141.5	141.7	141.3	141.1
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher* *N. Crabb*  
James Kinscher Norman Crabb, Ph.D.  
Chemist Director

**SWANSON ENVIRONMENTAL INC.**
**ORIGINAL**


Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

**REPORT NUMBER B 2532**
**ANALYTICAL REPORT**

SHIP  
TO

Swanson Environmental, Inc.  
24158 Haggerty Road  
Farmington Hills, MI 48024  
  
Atten: Steve Ridella

DATE August 20, 1985

PURCHASE ORDER NO. \_\_\_\_\_

SEI JOB NO ME3168/L3800

DATE COLLECTED 7-31-85

DATE RECEIVED 8-05-85

PAGE 3 OF 5
**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-5 BG2-1/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		30.1	29.7	30.6	27.0
Cadmium, mg/kg		1.6	1.3	1.7	1.8
Chromium, mg/kg		9	8	8	8
Copper, mg/kg		13	13	13	13
Lead, mg/kg		20	20	20	20
Nickel, mg/kg		18	18	18	18
Zinc, mg/kg		227.0	226.4	227.3	226.0
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-6 BG2-2/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		3.6	3.6	3.1	3.2
Cadmium, mg/kg		1.6	1.3	1.3	1.6
Chromium, mg/kg		12	12	12	12
Copper, mg/kg		16	16	16	17
Lead, mg/kg		25	25	25	25
Nickel, mg/kg		26	26	26	26
Zinc, mg/kg		113.5	114.7	115.0	115.2
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher* *N. Crabb*  
James Kinscher Norman Crabb, Ph.D.  
Chemist Director

**SWANSON ENVIRONMENTAL INC.**
**ORIGINAL**


Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

**REPORT NUMBER B 2532**
**ANALYTICAL REPORT**

SHIP  
TO . Swanson Environmental, Inc.  
24158 Haggerty Road  
. Farmington Hills, MI 48024  
. Atten: Steve Ridella

DATE August 20, 1985

PURCHASE ORDER NO. \_\_\_\_\_

SEI JOB NO. ME3168/L3800

DATE COLLECTED 7-31-85

DATE RECEIVED 8-05-85

PAGE 4 OF 5

**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-7 BG2-3/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		4.1	4.2	4.8	4.5
Cadmium, mg/kg		1.4	1.6	1.2	1.9
Chromium, mg/kg		14	14	15	14
Copper, mg/kg		23	22	23	23
Lead, mg/kg		32	32	24	32
Nickel, mg/kg		33	33	33	33
Zinc, mg/kg		301.0	301.0	302.2	302.0
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-8 BG3-1/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		19.6	21.7	22.4	21.4
Cadmium, mg/kg		1.1	1.2	0.8	0.6
Chromium, mg/kg		8	8	8	8
Copper, mg/kg		11	11	11	10
Lead, mg/kg		21	21	21	21
Nickel, mg/kg		15	15	16	15
Zinc, mg/kg		34.1	34.3	34.1	34.2
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher* *Norman Crabb*  
James Kinscher Norman Crabb, Ph.D.  
Chemist Director

**SWANSON ENVIRONMENTAL INC.**
**ORIGINAL**


Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

**REPORT NUMBER B 2532**
**ANALYTICAL REPORT**

SHIP TO  
Swanson Environmental, Inc.  
24158 Haggerty Road  
Farmington Hills, MI 48024  
  
Atten: Steve Ridella

DATE August 20, 1985

PURCHASE ORDER NO. \_\_\_\_\_

SEI JOB NO. ME3168/L3800

DATE COLLECTED 7-31-85

DATE RECEIVED 8-05-85

PAGE 5 OF 5

**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-9 BG3-2/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		1.2	1.3	1.4	1.1
Cadmium, mg/kg		1.0	1.0	0.8	1.0
Chromium, mg/kg		10	9	9	9
Copper, mg/kg		12	13	13	14
Lead, mg/kg		20	20	20	20
Nickel, mg/kg		19	18	18	19
Zinc, mg/kg		556	560	554	558
Cyanides, Total, mg/kg	1	<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-10 BG3-3/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		4.4	4.5	4.6	4.7
Cadmium, mg/kg		0.8	1.2	1.2	1.4
Chromium, mg/kg		17	16	17	17
Copper, mg/kg		23	22	22	24
Lead, mg/kg		31	31	31	31
Nickel, mg/kg		35	34	36	35
Zinc, mg/kg		602	605	600	603
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher* *Norman Crabb*  
James Kinscher Norman Crabb, Ph.D.  
Chemist Director

**SWANSON ENVIRONMENTAL INC.**

**ORIGINAL**



Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

REPORT NUMBER B 2532

**ANALYTICAL REPORT**

SHIP TO • Swanson Environmental, Inc.  
24158 Haggerty Road  
• Farmington Hills, MI 48024  
• Atten: Steve Ridella

DATE August 26, 1985

PURCHASE ORDER NO. \_\_\_\_\_

SEI JOB NO. ME3168/L3800

DATE COLLECTED 7-31-85

DATE RECEIVED 8-05-85

PAGE 1 OF 2

**Soil Samples (Stanley Tool - Duplicate)**

Parameter	SEI ID Sample ID	3800-1 BG1-1/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		6.8	7.6	7.3	7.2
Cadmium, mg/kg		1.2	1.2	1.2	1.2
Chromium, mg/kg		10	10	10	10
Copper, mg/kg		11	11	11	11
Lead, mg/kg		12	12	12	12
Nickel, mg/kg		14	14	14	14
Zinc, mg/kg		157	158	158	157
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-3 BG1-3/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		3.9	3.8	3.4	3.6
Cadmium, mg/kg		2.6	2.4	2.4	2.4
Chromium, mg/kg		18	18	18	18
Copper, mg/kg		22	22	22	21
Lead, mg/kg		28	22	28	28
Nickel, mg/kg		36	37	36	36
Zinc, mg/kg		242	242	242	243
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher*  
James Kinscher  
Chemist

*N. Crabb*  
Norman Crabb, Ph.D.  
Director

SWANSON ENVIRONMENTAL INC.

ORIGINAL



Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

REPORT NUMBER B 2532

ANALYTICAL REPORT

SHIP TO • Swanson Environmental, Inc.  
24158 Haggerty Road  
• Farmington Hills, MI 48024  
• Atten: Steve Ridella

DATE August 26, 1985

PURCHASE ORDER NO. \_\_\_\_\_

SEI JOB NO ME3168/L3800

DATE COLLECTED 7-31-85

DATE RECEIVED 8-05-85

PAGE 2 OF 2

Soil Samples (Stanley Tool - Duplicate)

Parameter	SEI ID Sample ID	3800-4 BGI-4/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		3.2	3.3	3.2	3.3
Cadmium, mg/kg		1.4	1.4	1.5	1.3
Chromium, mg/kg		4	4	4	4
Copper, mg/kg		5	5	6	5
Lead, mg/kg		14	14	14	14
Nickel, mg/kg		9	9	9	8
Zinc, mg/kg		152	151	151	152
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher*  
James Kinscher  
Chemist

*N. Crabb*  
Norman Crabb, Ph.D.  
Director

Professional Service Industries, Inc.  
Michigan Testing Engineers Division

LOG OF SOIL BORING NO. BG 1

PROJECT Soils Exploration

JOB NO 406-55078

LOCATION Stanley Company

SURFACE ELEV DATE 7-31-85 Fowlerville, Michigan

Sample & Type	Depth	Legend	SOIL DESCRIPTION	Penetration Blows Per Ft.	Moisture %	Natural Wt. PCF	Dry Den Wt. PCF	Unc. Comp Strength PCF	Gr %
	1	1'0"	Sandy TOPSOIL, black, moist S.T. no 1 Push from 6" to 6'6" R=2'						
	2		Silty CLAY, brown, moist						
	3	3'0"							
	4		Silty SAND, brown, moist S.T. no 2 Push from 3'6" to 6'6" R=3'						
	5	5'0"							
	6		Silty CLAY, brown and gray						
	7		S.T. no 3 Push from 6'6" to 9'6" R=3'						
	8								
	9	9'0"							
	10	9'6"	Sandy, silty CLAY, gray S.T. no 4 Push from 9'6" to 12' R=2'6"						
	11		Medium SAND, gray, wet						
	12	12'0"							
	13		END OF BORING						
	14								
	15								
	16								
	17								
	18								
	19								
	20								
	21								
	22								
	23								
	24								
	25								

- TYPE OF SAMPLE  
D DISTURBED  
UL UNDIST. LINEAR  
ST SHIMMY TUBE  
SS SPLIT SPOON  
PC ROCK CORE

REMARKS:

GROUND WATER OBSERVATIONS			
G.W. ENCOUNTERED AT	9	FT	6 INS
G.W. ENCOUNTERED AT		FT	INS
G.W. AFTER COMPLETION	2	FT	6 INS
G.W. AFTER		FT	INS

Michigan Testing Engineers Division

LOG OF SOIL BORING NO. BG 2

PROJECT Soils Exploration

JOB NO 406-55078

LOCATION Stanley Company

SURFACE ELEV

DATE 7-31-85

Fowlerville, Michigan

Sample & Type	Depth	Legend	SOIL DESCRIPTION	Penetration Blows Per Ft	Moisture %	Natural Wt. P.C.F	Dry Den Wt. P.C.F	Unc Comp Strength P.S.F	Gr %
	1		6" Sandy TOPSOIL, black, moist						
	2		Sandy silty CLAY, brown, moist						
	3		S.T. no 1 Push from 6" to 3'6" R=2'						
	4								
	5		S.T. no 2 Push from 3'6" to 6'6" R=3'						
	6	5'0"							
	7		Sandy silty CLAY, gray						
	8		S.T. no 3 Push from 6'6" to 9' R=2'6"						
	9	8'6"							
	10	9'0"	Medium SAND, gray, wet						
	11		END OF BORING						
	12								
	13								
	14								
	15								
	16								
	17								
	18								
	19								
	20								
	21								
	22								
	23								
	24								
	25								

TYPE OF SAMPLE  
 D DISTURBED  
 UL UNDIST. LINER  
 ST SHIELD BY TUBE  
 SS SPLIT SPOON  
 MC MUCK CORE

REMARKS:

GROUND WATER OBSERVATIONS

G.W. ENCOUNTERED AT 8 FT 6 INS  
 G.W. ENCOUNTERED AT FT INS  
 G.W. AFTER COMPLETION 2 FT 4 INS

# Michigan Testing Engineers Division

LOG OF SOIL / MS NO. BG 3

PROJECT Soils Exploration

JOB NO 406-55078

LOCATION Stanley Company

SURFACE ELEV DATE 7-31-85

Fowlerville, Michigan

Sample & Type	Depth	Legend	SOIL DESCRIPTION	Penetration Blows Per Ft	Moisture %	Natural Wt. P.C.F	Dry Den Wt. P.C.F	Unc. Comp Strength PSF	Gr %
1	9"		Sandy black TOPSOIL						
2			Sandy CLAY, brown, moist						
3			S.T. no 1 Push from 1' to 4' R=3'						
4									
5	5'0"		S.T. no 2 Push from 4' to 7' R=3'						
6			Sandy CLAY, gray, moist						
7									
8			S.T. no 3 Push from 7' to 10' R=3'						
9	9'0"								
10	10'0"		SILT and SAND, gray, wet						
11			END OF BORING						
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									

TYPE OF SAMPLE  
D DISTURBED  
U1 UNDIST LINER  
S1 SHELBY TUBE  
SS SP. IT SPOON  
RC ROCK CORE

REMARKS:

GROUND WATER OBSERVATIONS

G W ENCOUNTERED AT 9 FT 0 INS  
G W ENCOUNTERED AT FT INS  
G W AFTER COMPLETION 1 FT 0 INS  
G W AFTER HRS 1 FT INS

CLOSURE PLAN AND COST ESTIMATE  
STANLEY TOOLS DIVISION OF THE STANLEY WORKS  
FOWLerville, MICHIGAN

Prepared for:

Stanley Tools  
Fowlerville, Michigan

Prepared by:

ENVIRON Corporation  
Washington, D.C.

March 27, 1985

CLOSURE PLAN AND COST ESTIMATE  
STANLEY TOOLS DIVISION OF THE STANLEY WORKS  
FOWLerville, MICHIGAN

I. INTRODUCTION AND GENERAL INFORMATION

Stanley Tools operates a plating facility in Fowlerville, Michigan. The site, shown in Figure 1, is located in the SE 1/4, Section 10, Handy Township, Livingston County, Michigan. The manufacturing facility was purchased from Hoover Universal by Stanley Tools in 1980.

Process water from the plating operation is discharged into four surface impoundments or lagoons. The impoundments are located between the facility buildings and the Red Cedar River as shown in Figure 2. Clarifier underflow and rotofinish water is introduced into impoundment No. 1. Clarifier effluent is discharged directly into impoundment No. 3. The flow pattern is from impoundment No. 1 through the other lagoons to impoundment No. 4 where the flow is discharged to the river pursuant to NPDES Permit No. MI0003727 (See Attachment A).

The current volume of material in the surface impoundments is approximately 630,000 gallons. During normal plant operations, it is estimated that the maximum inventory of waste in the impoundments is approximately 434,000 gallons of sludge slurry material containing about 6 percent solids. In addition, we estimate that the impoundments also contain approximately 6400 cubic yards of contaminated bottom and embankment material. In addition to the sludge slurry material, the impoundments contain about 196,000 gallons of treated water, the bulk of

which is in impoundment No. 3. Wastewater treatment sludges from electroplating operations (with certain exceptions) are listed as hazardous waste (F006) under 40 CFR 261.31.

The treatment provided by the surface impoundments is limited to solids settling. Impoundment No. 1 is dredged on a regular basis (one to two times per year) to remove settled solids or sludge. Approximately 100,000 gallons of sludge is removed every time the impoundment has been dredged. Dredging has been accomplished using vacuum pumps. The sludge is pumped into tanker trucks (8,000 to 10,000 gallons capacity) licensed by the State of Michigan for hauling hazardous waste and trucked to Chem-Met Services, Inc. for solidification. Chem-Met Services, Inc. is a hazardous waste facility located in Wyandotte, Michigan, approximately 70 miles southeast of Fowlerville. Chem-Met Services, Inc. has qualified for interim status under RCRA. The solidified waste is then disposed of at Wayne Disposal, Inc., a hazardous waste facility which has interim status, located in Dearborn, Michigan.

With the exception of plumbing hardware (i.e., pipes, valves, etc.), the surface impoundments do not contain any auxiliary equipment. Because of the relatively small size of the impoundments, it is estimated that the closure process will be completed in about 60 to 70 days. The specific schedule for implementing the closure plan is described below.

## II. IMPOUNDMENT CLOSURE PROGRAM

### General

The closure program will be accomplished in an orderly manner to prevent any release of hazardous waste to the environment. The closure plan is designed to ensure that the facility will not require further maintenance.

The following are the specific tasks and associated timetable for the closure activities:

1. Closure of the four surface impoundments can begin as soon as an alternate wastewater and sludge treatment and storage system is in place and operating within the established NPDES effluent limitations. The new treatment system will include a filter press and sand bed filter system. Clarifier underflow and rotofinishing wastewater will be introduced to the filter press for dewatering, resulting in an electroplating sludge (F006) containing approximately 30 percent solids. The sludge will be stored in drums or leakproof roll off boxes on-site in accordance with 40 CFR 262.34 and will be disposed of off-site at Wayne Disposal, Inc. The liquid produced by the filter press will be returned to the clarifier. The clarifier overflow will be passed through the sand bed filter prior to its discharge to the Red Cedar River pursuant to the NPDES permit. It is anticipated that all of the necessary equipment will be installed and tested during June or July 1985.

2. The first step in closing the existing impoundments is to stop all of the present inflows to the current treatment system. All necessary changes in the wastewater flow (i.e., disconnecting inflow to the impoundments and installation of the necessary connections to the filter press) will be accomplished by August 1, 1985. As of that date, it is anticipated that no wastewater will be discharged to the impoundments, and the new wastewater and sludge treatment and storage system will be fully operational.
3. The next step in the closure process includes the discharge of approximately 196,000 gallons of treated water from the impoundments to the Red Cedar River. The water will be pumped from the impoundments to the River at a sufficiently low rate to prevent the resuspension of the sludge. The anticipated pumpage rate is 20 to 50 gpm; at the slowest rate, removal of the supernatant will be completed in about seven days. The proposed scheme entails first pumping wastewater from impoundment No. 1 and then sequentially pumping the remaining impoundments. The water in each impoundment will be tested to insure that its quality does not exceed the NPDES permit levels. Water that does exceed the applicable limits will remain in the impoundment and be removed with the sludge for off-site disposal or will be pumped to the on-site treatment system.
4. Prior to pumping of the sludge (as described below in Task No. 5), a temporary earthen dam and sediment fence will be constructed around the impoundment area as shown in Figure 2. The purpose of this fence

is to prevent runoff from leaving the impoundment area. The present chain link fence will be removed at that time.

5. Removal of the sludge from the surface impoundments will be done by vacuum pumps. As this technology has been used numerous times in cleaning impoundment No. 1, no particular difficulties are anticipated. The sludge will be pumped into tanker trucks to be transported off-site to Chem-Met Services, Inc. for solidification.<sup>1/</sup> The solidified sludge will be disposed of at Wayne Disposal, Inc.

The trucks will be stationed some 30 to 40 feet from the impoundment so as not to exert added load on the berm. The sludge will be conveyed to the truck via temporary pipelines. While no spills are anticipated, any accidental leak will be noted and the soil around the reported leak will be deemed hazardous material, excavated, and transported to Wayne Disposal, Inc. It is anticipated that between 45 to 55 tanker truck loads will be required to transport the sludge off-site. Emptying of the surface impoundments will commence on or about September 20, 1985 and is estimated to be completed in about 10 days. All hazardous waste will be properly manifested to meet EPA and DOT specifications.

---

<sup>1/</sup>

Stanley Tools currently plans to use Chem-Met Services, Inc. However, at the time of actual closure, Stanley Tools may choose to use another interim status or permitted treatment facility.

While an independent contractor will be hired by Stanley Tools for this and all subsequent tasks of the closure plan, the Manager of Plant Engineering and Environmental Controls will be responsible for compliance with the approved closure plan and other environmental regulations. Furthermore, periodic inspections will be made by the professional engineer who will certify the completed closure. None of the earthmoving equipment to be used in the implementation of this closure plan is owned by Stanley Tools.

6. Following the removal of the sludge, the pipelines, the impoundment inlets and outlets, the outlet manhole, and the groundwater monitoring wells in the area of the impoundments will be removed and transported off-site to Wayne Disposal, Inc.<sup>2/</sup>
7. The next step is the removal of the internal dikes of the impoundments and the removal of the sludge/soil residue on the bottom of the impoundments and on the exterior walls. Excavation will be accomplished using a front end loader and/or a drag line. The choice of equipment will depend on the condition of the bottom of the impoundments. A temporary ramp will be constructed on the east side to give the front end loader access to the impoundment. Based on previous experience (i.e., emptying impoundment No. 1), it is estimated that a layer of sludge about one to two inches deep will

---

<sup>2/</sup> Stanley Tools recognizes its obligation to monitor the groundwater during the active life of the impoundments and closure period. Accordingly, the groundwater wells will be sampled and removed at the latest possible date.

remain on the bottom of the impoundment following the vacuum operation. The drag line and/or the front end loader will remove the interior dikes and approximately one foot of soil and sludge residue from the bottom of all of the impoundments. In addition, a layer of about 6 inches will be scraped and removed from the walls of the impoundments. The estimated volume of soil and sludge residue to be removed is 6400 cubic yards. The excavated material will be manifested in accordance with EPA and DOT regulations and loaded into trucks licensed by the State of Michigan to transport hazardous waste. All hazardous waste will be transported to Wayne Disposal, Inc.

8. Excavation of the impoundments will proceed from the east to the west. Following the completion of the excavation, soil samples from the bottom and sides will be obtained using a split spoon sampler. The number of samples to be collected will be in accordance with the methodology given in U.S.EPA publication, "Test Methods for Evaluating Solid Waste" (SW-846). The depth of sampling will be 18 inches below the impoundment's invert. Each sample core obtained will be divided into three 6 inch samples. Samples will be obtained, stored and analyzed in accordance with the EPA guidelines for testing solid waste.

The first analyses will be conducted on the samples from the top 6 inches of the cores. Each sample will be analyzed for chromium, cadmium, and nickel using the EP Toxicity extraction procedure as noted in 40 CFR 261.24 and the distilled water leachate test for

cyanide. The samples will be subjected to statistical analysis, in accordance with EPA methodology set forth in SW-846. The upper six inch layer of soil will be excavated, removed, and treated as hazardous waste, if based on the statistical analysis, any of the following criteria are met:

- (1) The concentration of chromium or cadmium is above the established maximum levels of 5.0 mg/l and 1.0 mg/l, respectively, as promulgated under 40 CFR 261.24; or
- (2) The EP extract level of nickel exceeds 6.32 mg/l. This level is 10 times the EPA Ambient Water Quality Criteria for nickel (See 49 FR 42580, October 23 1984); or
- (3) The cyanide leachate concentration using a distilled water leachate test exceeds 2.0 mg/l. This level is 10 times the EPA Ambient Water Quality Criteria.

If the analyses of the first layer indicate that this layer must be removed, the middle (i.e., 6 inch to 12 inch) section of the cores will be subject to the same tests and analyses as the first set of samples. While it is anticipated that less than 18 inches of soil will have to be excavated and removed, if the last set of soil samples (i.e., the bottom 6 inch samples) indicate that the soils are hazardous according to the above criteria, additional boring and sampling will be initiated.

Excavation will be terminated when the statistical results based on guidelines presented in EPA's guidance document SW-846 indicate that the soils left in place (i.e., bottom area and embankment side walls) are acceptable according to the criteria described above. It is anticipated that physical excavation and removal of the contaminated soils, if required, will take approximately 20 days.

9. During the excavation of the impoundments and the loading of the trucks, special precautions will be observed to prevent off-site migration of hazardous waste. These precautions include (1) the sediment berm described above (See Task No. 4), (2) pumpage of surface run-on and rainfall from the excavated impoundments into either the on-site treatment system or into a tank truck for transport to an interim status or permitted treatment facility and (3) decontamination of any equipment prior to its leaving the site. Decontamination will include a truck and equipment washing facility. Prior to leaving the site, each truck will be washed to remove any contaminants. The wash water will be pumped to the on-site treatment system or to the tanker for transport to an interim status or permitted treatment facility.
10. The impoundment area will be filled and graded into the surrounding topography and crowned in the center to promote better surface drainage. It is estimated that approximately 13,500 cubic yards of clean fill will be required for this task.
11. The regraded impoundment area will be seeded to establish vegetation. The anticipated seedings will occur in November 1985. If climatic conditions do not permit seeding of a permanent cover, a temporary cover will be put in place immediately followed by a permanent cover to be seeded in early spring.
12. A security fence will be erected to complete the fencing of the whole plant.

All hazardous wastes which are generated as a result of this closure will be removed for treatment or disposal within 90 days after they are generated.

A licensed professional engineer will periodically inspect the site during the implementation of the closure process. When closure is completed, certification will be provided to the Regional Administrator by Stanley Tools and a licensed professional engineer stating that the facility has been closed in accordance with the specifications in the approved closure plan.

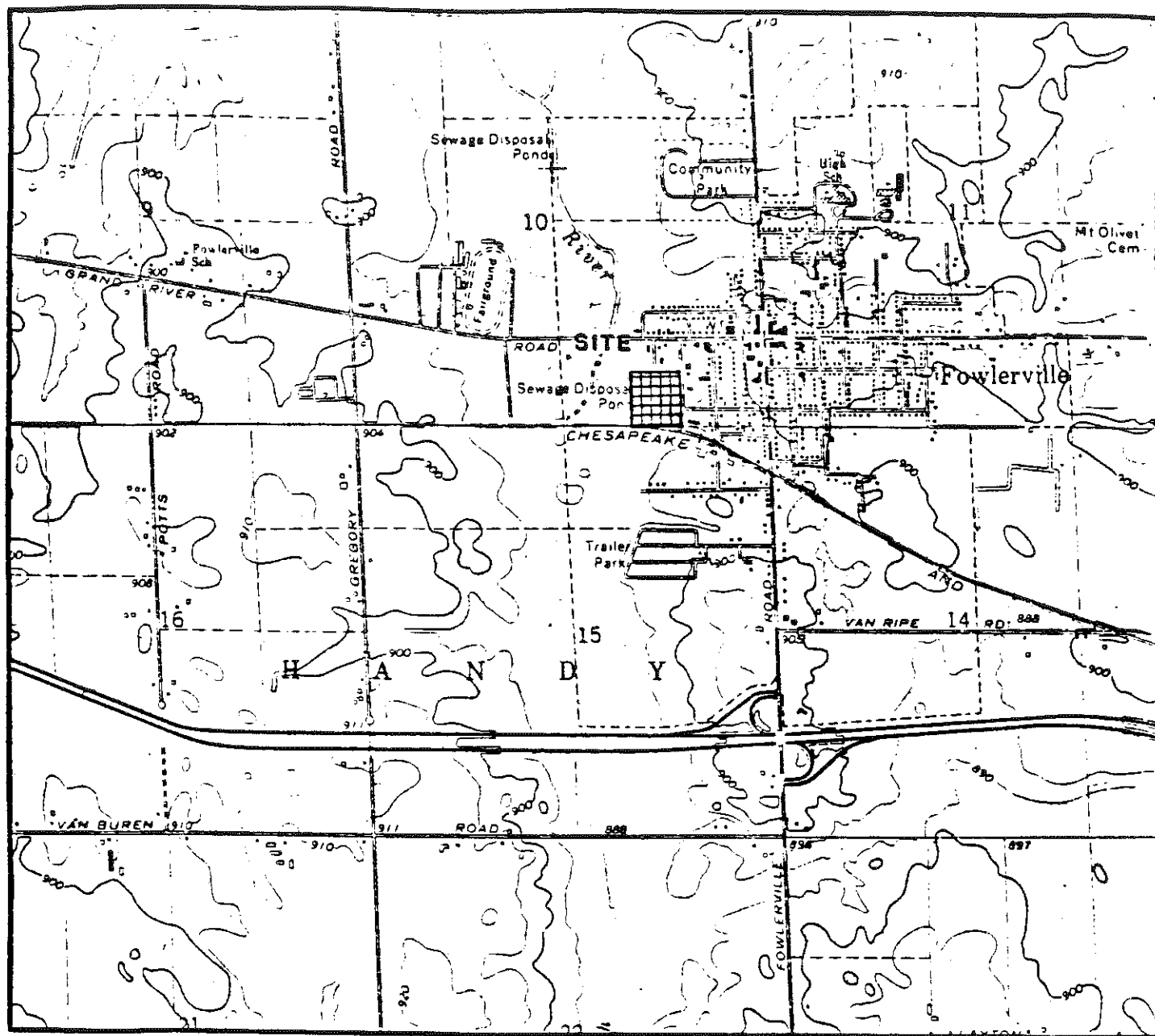
The closure cost estimate is shown in Appendix 1.

# APPENDIX 1

## CLOSURE COST ESTIMATE

1. Remove Fence (800 LF)	1,085
2. Construct Sediment Fence (850 LF)	500
3. Remove Manhole (1), Buried Pipelines (570 LF), Risers (2), Culverts (6), and Monitoring Wells (4)	1,500
4. Pump, Transport and Dispose Sludge (434,000 gal @ \$.29/gal)	125,860
5. Remove Internal Dikes (4800 CY)	7,200
6. Scrape or Drag Impoundment Area (1 acre, 1600 CY)	3,680
7. Test Soils (40 samples @ \$133/sample + \$650)	5,970
8. Transport and Disposal of Sludge & Contaminated Soil (6400 CY of soil @ \$42/CY)	268,800
9. Bring and Place Clean Fill (13,500 CY @ \$5.50/CY)	74,250
10. Grade (crown in center, slope to drain)	2,500
11. Seed and Mulch (1 acre, sown twice)	2,000
12. Reset Fence (500 LF)	2,250
13. Decontaminate Equipment	500
14. Inspections and Certification by Professional Engineer	<u>2,000</u>
TOTAL = \$	498,095

FIGURE 1



**SITE LOCATION MAP**

**STANLEY TOOL**

**SE 1/4, SECTION 10, HANDY TOWNSHIP,**

**LIVINGSTON COUNTY, MICHIGAN**

**NORTH**



scale



ADAPTED FROM U.S.G.S. 7.5' QUAD. FOWLERVILLE 1973

TRUCK consulting

ATTACHMENT A

STATE OF MICHIGAN



*File*

NATURAL RESOURCES COMMISSION

JACOB A. MOEFER  
E. M. LAITALA  
HILARY F. SNELL  
PAUL H. WENDLER  
HARRY H. WHITELEY  
JOAN L. WOLFE  
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
BOX 30026  
LANSING, MI 48909  
HOWARD A. TANNER, Director  
August 6, 1982

CERTIFIED MAIL

Stanley Tools - Fowlerville  
P.O. Box 829  
Fowlerville, MI 48836

Re: MI 0003727

Attention: A. M. Stock, Manager, Plant Engineering/Environmental Control

Gentlemen:

Your application for a National Pollutant Discharge Elimination System (NPDES) Permit has been processed in accordance with appropriate State and Federal regulations.

Your NPDES Permit contains: 1) limitations which require you to monitor your effluent in accordance with Part I, Section A; and 2) a schedule of compliance for submittal of information concerning other permit requirements.

REVIEW THE PERMIT EFFLUENT LIMITS AND PERFORMANCE SCHEDULES CAREFULLY. These are subject to the criminal and civil enforcement provisions of both state and federal law. All permit violations are audited by the United States Environmental Protection Agency and will appear in a published quarterly non-compliance report made available to agencies and the public.

Your monthly operating report forms will be transmitted to you in the near future. These reports are to be submitted monthly as required by your NPDES permit.

Very truly yours,

WATER QUALITY DIVISION

*Karl Zollner, Jr. 161*

Karl Zollner, Jr., P.E., Chief  
Permits Section

Enclosure: Permit

KZ/bl:clp

cc: A. Manzardo (2), T. Newell, Data Center, Files,  
Comprehensive Studies Section, Point Source Studies Section,  
Compliance Section, C. Odin, Southeast Michigan Council of Governments

14

CLOSURE PLAN FOR STANLEY TOOLS DIVISION

FOWLERVILLE PLANT

TANKS

EPA Facility I. D. No. MID 099124299

Owner's or Operator's Name Stanley Tools Divison

Address & Phone NO. 425 Frank Street; Fowlerville, MI. 48836 PH 223-9154

Facility Address Same

I. Facility Conditions

A. General - Information

1. 65000 Sq. ft. located on 11.7 acre site.
2. 7 tanks as follows:
  - a. Roto finish sump
  - b. Roto finish pumping station
  - c. Chrome destruct tank
  - d. Cyanide destruct tanks
  - e. Waste oil storage
  - f. Claifier
  - g. Sludge sump after claifier.
3. Storage:
  - a. Concrete block and wood construction building utilized for storing drums.
  - b. Capacity of 40 fifty five gal. drums.
4. Other facilities on-site.
  - a. Inpoundment
  - b. 706,020 approximate gallons of material.
5. Waste Characterization
  - a. Lagoons - Metal Hydroxides
    - Roto finish sump                      Zn hydroxides and alkaline soap solution
    - Roto finish pumping station      Zn hydroxides and alkaline soap solution.
    - Chrome destruction tank - Trivalent chrome at 3pH
    - Cyanide destruct tank - Cyanide solution at various degrees of treatment

5. a. (cont.)

Clarifier . Metal Hydroxide solution.

Sludge sump Metal Hydroxide solution.

Waste oil tank Water oil emulsion.

b. Physical State - Liquid (all tanks).

c. N/A

d. Specific gravity 1.2 approximately

B. Maximum Amount of Inventory

1. Hydroxide sludge - 450,000 gals est.

2. Cyanide solution for treatment - 99,000 gals.

3. Trivalent chrome - 1,100 gals.

4. Water oil emulsion - 7,000 gals.

C. N/A

D. Schedule of final closure

To be completed upon cease of operation.

# COST

## Equipment

Drag line 120 hours @ \$50.00/hr. \$ 6,000

Bulldozer 120 hours @ \$50.00/hr. 6,000

Trucks 123 loads @ \$280.00/load 34,440

## Land Fill Cost

2,468 cu. yds. @ \$8.00/yd. 19,744

## Sludge Removal

400,000 gal. @ .26/gal. 104,000

## Labor

120 hr. x 3 persons x \$20.00/hr. 7,200

## Laboratory Analysis

\$6,000

6,000

TOTAL

\$183,384

Lagoon

$$\begin{aligned}
 \#1 & (38+15) \times (71 \times 15) \times 4 = 18232 \text{ cu. ft} \\
 \#3 & (38+18) \times (71 \times 18) \times 6 = 29904 \text{ cu. ft} \\
 \#2 & (35+15) \times (77+15) \times 5 = 23000 \text{ cu. ft} \\
 \#1 & \text{ same as } \#2 = 23000 \text{ cu. ft} \\
 & 94136 \text{ cu. ft}
 \end{aligned}$$

$$94136 \times 7.5 = 706,020 \text{ gal of sludge}$$

$$\begin{aligned}
 & 7 \frac{3}{4} \times 10 \frac{3}{4} \\
 & 1 \frac{1}{5} \times 8 \frac{1}{5}
 \end{aligned}$$

4.4 SAMPLE CLOSURE PLAN OUTLINE: SURFACE IMPOUNDMENTS  
IN WHICH WASTES ARE REMOVED AT CLOSURE

EPA Facility ID No. \_\_\_\_\_

Owner's or Operator's Name \_\_\_\_\_

Address & Phone No. \_\_\_\_\_

Facility Address \_\_\_\_\_

I. FACILITY CONDITIONS

A. General information

1. Size of impoundment facility (include reference map)
2. Volume of impoundment
3. Type of treatment
4. Copy of NPDES water pollution control permit if you discharge through a point source to U.S. waters
5. Schedule of dredging, if applicable
  - a. Volume of waste dredged
  - b. Frequency of dredging
  - c. Procedures for dredging
  - d. Method of disposal of dredged materials

B. Schedule of partial closures, if applicable (milestone chart)

1. Size of each area partially closed
2. Methods for partial closure (cover or removal of wastes)
3. Maintenance of partially closed areas

C. Maximum amount of waste ever on-site in any stage of processing

1. Maximum volume of waste in impoundment
2. Maximum volume of waste in storage awaiting impoundment

D. Inventory of auxiliary equipment

E. Schedule of final closure (milestone chart)

1. Final date wastes accepted
2. Date all treatment completed
3. Date all free liquids removed
4. Date all sludges removed
5. Date facility decontaminated

6. Final date of completed closure
7. Total time required to close facility
8. Justification if closure is longer than six months

## II. REMOVING ALL INVENTORY

- A. Maximum amount of waste on-site in any stage of processing
  1. Total amount of wastes in drums and number of drums in storage, if applicable
  2. Volume of bulk wastes in any stage of processing including storage
  3. Total amount of residues from processing
  4. Maximum quantity of liquid in impoundment
  5. Maximum quantity of sludge in impoundment
- B. Procedures for treating or disposing of inventory, including free liquids, on-site
  1. Amount of inventory treated on-site
  2. Method of treatment (e.g., package treatment facility, evaporation, biological treatment)
  3. Method of discharge or disposal, if disposed in a landfill on-site
  4. Time estimate for treatment
- C. Procedures for removal of all liquids not treated and disposed on-site
  1. Quantity of liquids not treated and discharged on-site
  2. Method of off-site treatment or disposal
  3. Approximate distance to off-site TSDF
- D. Removing sludge
  1. Volume of sludge to be removed
  2. Method for removing sludge and residuals
    - a. Is equipment on-site or rental required?
    - b. Owner or operator labor or contractor?
  3. Treating sludge
    - a. If treatment is performed on-site, describe treatment

- b. Stabilizing sludge
    - (1) Type of bulking agent used
    - (2) Amount of bulking agent required
    - (3) Source of material
    - (4) Equipment required
    - (5) Availability of equipment
- 4. Disposing of sludge
  - a. If on-site disposal, provide map of disposal location
    - (1) Quantity disposed on-site
    - (2) Size of area needed for disposal
    - (3) Procedures for disposal
  - b. If off-site treatment or disposal
    - (1) Quantity removed to an off-site TSDF
    - (2) Method of treatment or disposal (e.g., landfill, etc.)
    - (3) Approximate distance to TSDF

### III. DECONTAMINATING THE FACILITY

- A. Area of facility with potential soil contamination (sq. yd.)
  - 1. List areas with potential contaminated soil
    - a. Number of soil samples, if necessary
    - b. Criteria for determining contamination
  - 2. Estimated depth of soil requiring removal
  - 3. Total amount of contaminated soil (cu. yd.)
    - a. Amount of contaminated soil disposed on-site
      - (1) Method of disposal
      - (2) Construction required if applicable
      - (3) Size, location and design of on-site disposal method
    - b. Amount of contaminated soil disposed off-site

- B. All equipment and/or facilities (e.g., tanks, basins, earth-moving equipment, piping and containers) requiring decontamination
1. Name each piece of equipment and/or storage facilities and procedures for cleaning (e.g., steam cleaning, hydro-blasting, etc.)
    - a. Owner or operator labor or contractor
    - b. Quantity of residues from cleaning
  2. Number of containers to be disposed or decontaminated
    - a. Method of cleaning and/or disposing of containers
    - b. Volume of residues
  3. Method for disposing of residues from decontamination (including wastewater and liquid wastes)
    - a. Quantity managed on-site
      - (1) Method of treatment or disposal method
      - (2) Size, location and design of on-site disposal method
      - (3) Disposal plans for liquid waste
    - b. Quantity disposed off-site
  4. Estimated amount of water on-site requiring removal (e.g., snow and rain accumulation)
    - a. Methods for removal
    - b. Source of treatment or disposal (on-site versus off-site)
      - (1) If on-site, describe procedures

#### IV. GROUND-WATER MONITORING

- A. Analyses required during closure
1. Maximum number of ground-water quality analyses required during closure
  2. Maximum number of ground-water contamination analyses required during closure
  3. Details of ground-water monitoring program (include copy of ground-water sampling and analysis program when available)

B. Maintenance of monitoring equipment

1. Number of wells requiring redrilling
2. Number of wells requiring replacement
3. Need for replacement parts to system (name parts, e.g., pumps, seals, caps)
4. Required routine maintenance

V. CLOSURE CERTIFICATION

- A. Approximate number or schedule (e.g., every two weeks) of periodic inspections

## II. Removing All Inventory - Copper Cyanide

### A. Maximum amount of waste on-site.

1. N/A
2. 3 tanks with 33,000 gal capacity ea.
3. N/A

### B.

1. Possibility of 99,000 gals requiring pre treatment.
2. Equipment needed would be pumps for circulation, agitation and removal of liquid from tanks. Materials needed would be sodium hyperchlorite, sodium hydroxide, polyelectrolytes, calcium chloride, ferrous sulfate.
3. Possibility of 99,000 gals requiring disposal after pre treatment.

### C. Methods and Procedures for treating, disposing or removing inventory.

#### 1.

- a. Possible 99,000 gals.
- b. pH adjustment and precipitation in on site clarifier. Supernate to discharge basin and underflow discharged to settling lagoons.
- c. N/A

#### 2.

- a. N/A
- b. N/A
- c. N/A

## III. Decontaminating the Facility

### A. N/A

### B. Cleaning of equipment and facility.

1. Cyanide treatment tanks would only require washing with water and brushes.
  - a. Labor supplied by owner
  - b. Approximately 3,000 gals.
2. Treatment Method for residue.
  - a. Pump to clarifier on site for final treatment consisting of pH

## II. Removing All Inventory - Chromium

### A. Maximum amount of waste on site.

1. N/A
2. 1100 gal. of trivalent chrome located in chromium destruct system.
3. N/A

### B. Pretreatment

1. N/A
2. N/A
3. N/A

### C. Method and Procedures for treating and disposing

1. a. 1100 gals.  
b. pH adjustment and precipitation.  
c. N/A
2. Procedures for off site removal of Inventory
  - a. N/A
  - b. N/A
  - c. N/A

## III. Decontaminating the Facility

### A. N/A

### B. Cleaning of equipment & facility

1. Chrome destruct system to be scrubbed with brushes and water
  - a. By owner labor.
  - b. N/A
2. Treatment and Disposal
  - a. Approximate 1500 gals.  
pH adjustment and precipitation.
  - b. N/A

## IV. Closure Certification

- A. One inspection would be adequate for inspecting and approving this unit for closure

2. a. (cont.)

adjustment and precipitation.

b. N/A

#### IV. Closure Certification

A. One inspection is sufficient to certify closure has met above requirements and is safe to the environment.

## II. Waste Oil Storage Tank - Tramp Oil Emulsion

### A. Maximum amount of waste on site.

1. N/A
2. 7,000 gals of waste tramp oil.
3. N/A

### B. N/A

### C. Methods and procedures for disposing or removing inventory.

1. N/A
2. Procedure for off-site removal of inventory.
  - a. Approximately 7,000 gals.
  - b. Remove via certified hauler with cargo tanker.
  - c. Approximately 60 miles to TSDF

## III. Decontaminating the facility.

### A. N/A

### B.

1. Waste oil storage tank - to be steam cleaned.
  - a. By labor supplied by owner.
  - b. Approximately 1,000 gallons of residue will be generated.
2. Treatment or disposal method for residue.
  - a. N/A
  - b. Approximately 1,000 gallons sent to a certified waste oil disposal facility located approximately 60 miles from this facility.

## IV. Closure Certification.

- A. One inspection is sufficient by certified engineer to assure proper cleaning techniques have been carried out.

## II. Clarifier - Removing Inventory

- A. Maximum amount of waste on-site.
  - 1. Approximately 28,000 gallons.
  - 2. N/A
  - 3. N/A
- B. Pretreatment
  - 1. N/A
  - 2. N/A
  - 3. Approximately 28,000 gallons.
- C. Methods and procedure for disposing of inventory.
  - 1. Procedure for on-site disposal.
    - a. 28,000 gal. approximate.
    - b. Blow down to transfer sump and then to lagoons for precipitation.
    - c. Use existing lagoon system.
  - 2. N/A

## III. Decontaminating the facility.

- A. N/A
- B. Equipment needing cleaning.
  - 1. Clarifier
    - Water for washing and brushes for scrubbing.
    - a. Owner to supply labor.
    - b. Approximately 6,000 gallons of residue will be generated.
  - 2. Disposal of Residue
    - a. Pump to existing lagoon for precipitation.
    - b. N/A

## IV. Closure Certification

- A. One scheduled visit for inspection of this Clarifier is sufficient to assure decontamination.

## II. Sludge Sump after Clarifier - Removal of Inventory

### A. Maximum amount of waste on-site.

1. N/A
2. Approximate 2,160 gals.
3. N/A

### B. Pretreatment N/A

### C. Methods and procedures for disposing.

1. Procedure for on-site disposal
  - a. 2,160 gallons.
  - b. Pump to existing lagoons for settling and precipitation.
  - c. Existing lagoons are adequate.
2. Procedure for off-site removal.

N/A

## III. Decontaminating the facility.

### A. N/A

### B. All equipment and facility needing cleaning.

1. Clarifier blow down sump and pumps. This will be accomplished by washing with water and scrubbing down with brushes.
  - a. Owner labor to be utilized.
  - b. Approximately 3,000 gallons will be used for cleaning.
2. Disposal of Residue
  - a. This material will be transferred to existing lagoons for precipitation.
  - b. N/A

## IV. Closure Certification

- A. One inspection by Certifying Engineer would be sufficient to assure proper disposal procedure has been utilized.

## II. Roto Finish Sump - Removing Inventory.

### A. Maximum amount of waste on-site.

1. N/A
2. Approximate 6,000 gallons in one tank.
3. N/A

### B. Pretreatment

N/A

### C. Method and procedure for disposing.

1. N/A
2. Procedure for off site removal.
  - a. Approximately 6,000 gals.
  - b. Addition of water mix into pumpable consistency and hauling away in a cargo tanker.
  - c. Distance to TSDF site is 60 miles.

## III. Decontaminating the Facility.

### A. Area of facility with potential soil contamination.

N/A

### B. All equipment and facility requiring cleaning.

1. Concrete tank and pump.

The cleaning procedure will require water for washing and brushes for scrubbing.

- a. Owner labor will be utilized.
  - b. 3,000 gallons of residue will be generated.
2. Disposal methods for residue
    - a. N/A
    - b. 3,000 gallons sent off-site for land filling at TSDF site approximately 60 miles from facility.

## IV. Closure Certification

- A. One inspection by Certifying Engineer should be sufficient to assure proper decontamination has been accomplished.

## II. Roto Finish Sump - Removing Inventory

### A. Maximum amount of waste on site.

1. N/A
2. 1,000 gallons in one tank.
3. N/A

### B. Pretreatment

N/A

### C. Method for disposing.

1. Procedure for on-site disposal.
  - a. 1,000 gallons.
  - b. Pump to existing settling lagoons.
  - c. N/A

## III. Decontaminating the facility.

### A. N/A

### B. All equipment and facilities requiring cleaning.

1. One concrete tank and pumps. They will need to be washed and scrubbed. The pumps will need to be flushed out.
  - a. Owner labor will be utilized.
  - b. Approximately 500 gallons of residue will be generated.
2. Disposal of residue.
  - a. Material to be transferred to settling lagoons for precipitation and further processing.
  - b. N/A

## IV. Closure Certification

- A. One inspection by Certifying Engineer should be sufficient to assure proper decontamination has been accomplished.

### 3.6 SAMPLE CLOSURE PLAN OUTLINE: TANKS

EPA Facility I.D. No. \_\_\_\_\_  
Owner's or Operator's Name \_\_\_\_\_  
Address & Phone No. \_\_\_\_\_  
Facility Address \_\_\_\_\_

#### I. FACILITY CONDITIONS

##### A. General information

1. Size of facility
2. Number of tanks
3. Storage facilities
  - a. Type (e.g., bulk or drums)
  - b. Capacity/volume
4. Other facilities on-site
  - a. Type (landfill, incinerator, basin, etc.)
  - b. Volume/capacity
5. Waste characterization (to be filled out for each type of waste in inventory [e.g., phenolic wastewater, scrubber sludge, etc.], including waste material at any stage of processing, and/or any residue generated by the normal processing of the waste before or during closure, including contaminated soil or containers).
  - a. Chemical composition
  - b. Physical state (i.e., liquid, solid, gas or mixture)

---

\*NOTE: The Interim Status Standards require that "unless the owner or operator can demonstrate...that any solid waste removed from his tank is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 262, 263, and 265 of this Chapter" (§265.197) (emphasis added).

- c. Combustion temperature
  - d. Specific gravity of the waste
- B. Maximum amount of inventory ever on-site in any stage of processing
- C. Inventory of auxiliary equipment
- D. Schedule of final closure (milestone chart)
  - 1. Final date wastes accepted
  - 2. Dates for completion of inventory disposal
    - a. Date all preprocessing completed
    - b. Date all on-site disposal completed
    - c. Date that all inventory has been disposed on-site
    - d. Date that all inventory has been removed off-site
  - 3. Final date facility decontaminated
  - 4. Final date closure completed
  - 5. Total time required to close the facility
  - 6. Justification if closure is longer than six months

II. REMOVING ALL INVENTORY (to be filled out for each type of waste in inventory, including waste material at any stage of processing, and/or any residue generated by the normal processing of the waste before or during closure)\*

- A. Maximum amount of waste on-site in any stage of processing
  - 1. Total amount of waste/residue in drums and number of drums, if applicable
  - 2. Total amount of waste/residue in tanks and number of tanks (include tag number or other means of identification for each tank)

---

\*NOTE: The Interim Status Standards note that "unless the owner or operator can demonstrate...that any solid waste removed from his tank is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 262, 263, and 265 of this Chapter" (§265.197) (emphasis added).

3. Total amount of waste/residue in other forms of storage, if applicable (e.g., waste piles, basins, drainage pits, etc.)
- B. Pretreatment
  1. Quantity requiring pretreatment
  2. Pretreatment process (including any equipment or materials needed)
  3. Total amount to be treated or disposed following pretreatment
- C. Methods and procedures for treating, disposing, or removing inventory
  1. Procedures for on-site inventory treatment or disposal
    - a. Quantity
    - b. Method of treatment or disposal
    - c. Size of area, capacity or number of trenches necessary for inventory treatment or disposal
  2. Procedures for off-site removal of inventory
    - a. Quantity
    - b. Method of treatment or disposal
    - c. Approximate distance to off-site TSDF

### III. DECONTAMINATING THE FACILITY

- A. Area of facility with potential soil contamination (sq. yd.)
  1. List areas with potential contaminated soil
    - a. Number of soil samples, if necessary
    - b. Criteria for determining contamination
  2. Estimated depth of soil requiring removal
  3. Total amount of contaminated soil (cu. yd.)
    - a. Amount of contaminated soil disposed on-site
    - b. Amount of contaminated soil removed off-site
- B. All equipment and/or facilities requiring cleaning (e.g., tanks, surface impoundments, drainage pits, discharge control equipment, tank trucks)

1. Describe each piece of equipment and/or storage facilities and procedures for cleaning (e.g., steam-cleaning, hydro-blasting, etc.)
  - a. Owner or operator labor or contractor
  - b. Quantity of residues from cleaning
2. Treatment or disposal method for residues from decontamination (including wastewater and liquid wastes)
  - a. Quantity treated or disposed on-site and method of treatment or disposal
  - b. Quantity sent off-site, method of treatment or disposal, and approximate distance to TSDF

#### IV. CLOSURE CERTIFICATION

- A. A schedule or estimate of the number of periodic inspections by the certifying engineer anticipated during closure.

CLOSURE PLANS  
SURFACE IMPOUNDMENTS

I. Facility Conditions

A. General Information

1. Four lagoons located on a site which is 155 ft. wide and 215 ft. long.
2. Volume of 706,020 gallons of solutions.
3. Precipitation and decanting.  
Sludge is removed off site.
4. See attached NPDES Permit.
5. Schedule of pumping - Depending on production once or twice per annum.
  - a. Approximately 190,000 gallons per occurrence.
  - b. Once or twice per annum as required.
  - c. Agitation and pumping to tankers. All discharge points from lagoon in pumping process are shut off.
  - d. Transported to a certified TSDF Disposal site located 60 miles from facility.

B. Schedule of Partial Closure

N/A

C. Maximum amount of waste ever on site in any stage of process.

1. Approximately 350,000 gals. of sludge in impoundments.
2. Approximately 144,260 gallons of waste in storage awaiting impoundment.

D. Inventory of Auxiliary Equipment.

N/A

E. Schedule of final closure.

N/A

II. Removing all Inventory.

A. Maximum amount of waste on-site.

1. Waste in drums is disposed of on a regular basis. 40 drums is the maximum accumulated at any time.

II. A. (cont.)

2. Approximately 144,260 gallons.

3. Total amount of residue from process.

N/A

4. Maximum quantity liquid in impoundment is approximately 500,000 gallons.

5. Maximum quantity of sludge in impoundment is approximately 400,000 gallons.

B. Procedure for treating and disposing of inventory including free liquid on-site.

1. Approximately 144,260 gallons treated on-site.

2. Method of treatment is oxidation & reduction, pH adjustment, clarification and precipitation.

3. N/A

4. Time for total treatment of waste and residue generated from cleaning would be approximately 12 weeks.

C. Procedures for removal of all liquids not treated and disposed of on-site.

1. 7,000 gallons of waste tramp oil emulsion.

2. Handled by a certified TSDF facility.

3. Approximately 60 miles from this facility to TSDF.

D. Removing Sludge

1. Approximately 400,000 gallons of sludge will be removed.

2. Method of removing sludge and residuals.

a. Equipment for sludge removal is supplied by waste hauler and disposal company.

b. Labor is supplied by contractor.

3. Treating Sludge.

a. N/A

b. N/A

4. Disposing of sludge

a. N/A

b. Off-site disposal

1. Approximately 400,000 gallons to be disposed of.

II. D. 4. (cont.)

2. Will be land filled at certified site.

3. Disposal site located approximately 60 miles from facility.

III. Decontaminating the Facility.

A. Area of facility with potential soil contamination is approximately 3702 sq. yds.

1. Areas with potential contamination would include four existing lagoons.

a. Six samples of soil should be sufficient.

b. Extraction procedure toxicity test will be criteria for determining contamination.

2. Approximately a two foot depth of soil will be removed.

3. Approximate amount of contaminated soil would be 2468 cu. yds.

a. N/A

b. 2468 cu. yds. to be disposed off-site.

B. All equipment requiring decontamination.

1. Bulldozer, dragline, and trucks.

Wash with water in a confined area bermed with sand.

a. Contractor to furnish labor.

b. 30 cu. yds. approximate.

2. Number of containers to be disposed.

N/A

3. Mix water and residue with sand in confined area and removed to a certified land fill.

a. Quantity managed on-site

N/A

b. Quantity disposed of off-site 30 to 40 cu. yds.

4. Estimate amount of water on-site requiring removal.

N/A

**STANLEY**

# **T H E   S T A N L E Y   W O R K S**

*Since 1843*

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

**RECEIVED**

**JUN 06 1986**

June 5, 1986

**SOLID WASTE BRANCH  
U.S. EPA, REGION V**

Mr. Jim Roberts  
Michigan Dept. of Natural Resources  
608 West Allegan Street  
Lansing, Michigan 48909

Dear Jim:

Stanley Tools - Fowlerville is completing the closure of the surface impoundments that were used to settle metal hydroxide sludge. The actual work of removal commenced on October 7, 1985. All liquid sludge was removed in approximately ten days. The balance of the impoundments, including the vegetation, the exterior berms, interior walls, and approximately 1-1/2 feet from the bottom was removed. During November, 1985 the site experienced inclement weather and operations ceased.

We have conducted random sampling to determine whether or not additional soil needs to be removed. As per our discussion this morning, we have previously submitted to Mr. Richard Traub at USEPA Region 5 a summary of the activities on the lagoon and we indicated to him when we made this submission in February, 1986 that we would be proceeding with the remainder of the clean-up as soon as the weather permitted. We are anxious at this time to complete the closure.

I have enclosed for your review a copy of the random sampling analytical work, as well as a copy of the background borings upon which the clean standards were established. I have also included a drawing indicating the locations at which the random samples were taken. We have calculated the statistical limits for the clean standards according to the background borings.

June 5, 1986

I will be in contact with you Friday, June 6th, to discuss this submission. Stanley Tools - Fowlerville is interested in completing the closure. However, I am concerned that to reach the clean standards of the background borings, we would need to excavate an additional three feet of soil at an approximate cost of \$600,000. Looking at the data, it appears that we would meet the environmental concerns of the site by excavating in many cases one additional foot. Your consideration of this request will be appreciated.

Thank you.

Yours very truly,



as

Delia M. Christensen  
The Stanley Works  
Stanley Laboratory  
1309 Corbin Avenue  
New Britain, Connecticut 06053

cc: Bob Basch  
Carol Witt

STATISTICAL LIMITS FOR CLEAN STANDARD

	1 - 3 FT.	3 - 7 FT.	6.5' - 10'	Across Boring
	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>All</u>
Ni	18.8	24.1	36.	24.
Cd	8.2	11.	15.7	12.1
Zn	16.3	388.	300.	347.
Cu	12.	15.	23.	18.
Cd	1.65	1.5	2.	1.7
As	24.	3.2	4.9	12.6
Pb	20.8	23.7	31.	26.

Level 1 - Sample 1 - Borings 1, 2, & 3

Level 2 - Sample 2 - Borings 1, 2, & 3

Level 3 - Sample 3 - Borings 1, 2, & 3

All - Represents all samples, all borings

**SWANSON ENVIRONMENTAL INC.**

**ORIGINAL**



Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53006  
telephone (414) 783-6111

REPORT NUMBER B 2532

**ANALYTICAL REPORT**

SHIP TO  
Swanson Environmental, Inc.  
24158 Haggerty Road  
Farmington Hills, MI 48024  
Atten: Steve Ridella

DATE August 20, 1985  
PURCHASE ORDER NO. \_\_\_\_\_  
SEI JOB NO. ME3168/L3800  
DATE COLLECTED 7-31-85  
DATE RECEIVED 8-05-85  
PAGE 1 OF 5

**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-1 BG1-1/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		4.5	4.8	4.8	4.8
Cadmium, mg/kg		1.9	1.6	1.8	1.5
Chromium, mg/kg		8	8	8	8
Copper, mg/kg		10	10	10	11
Lead, mg/kg		21	21	21	21
Nickel, mg/kg		21	20	19	20
Zinc, mg/kg		101.5	100.9	101.1	101.2
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-2 BG1-2/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		3.4	3.3	3.4	2.9
Cadmium, mg/kg		1.4	1.5	1.8	1.8
Chromium, mg/kg		11	10	10	9
Copper, mg/kg		13	14	13	14
Lead, mg/kg		23	23	23	23
Nickel, mg/kg		24	22	23	23
Zinc, mg/kg		177.9	179.5	178.9	178.9
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher* *N. Crabb*  
James Kinscher Norman Crabb, Ph.D.  
Chemist Director

**SWANSON ENVIRONMENTAL INC.**
**ORIGINAL**

 Laboratory Services Division  
 3490 North 127th Street  
 Brookfield, Wisconsin 53005  
 telephone (414) 783-6111

REPORT NUMBER B 2532

**ANALYTICAL REPORT**

 SHIP TO: Swanson Environmental, Inc.  
 24158 Haggerty Road  
 Farmington Hills, MI 48024  
 Attn: Steve Ridella

DATE August 20, 1985

PURCHASE ORDER NO.

SEI JOB NO. ME3168/L3800

DATE COLLECTED 7-31-85

DATE RECEIVED 8-05-85

PAGE 2 OF 5

**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-3 BG1-3/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		5.3	5.4	5.4	5.2
Cadmium, mg/kg		2.5	2.2	2.5	2.5
Chromium, mg/kg		16	16	16	16
Copper, mg/kg		22	23	23	23
Lead, mg/kg		29	29	29	29
Nickel, mg/kg		38	38	37	38
Zinc, mg/kg		259.6	261.3	260.4	261.3
Cyanides, Total, mg/gk		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-4 BG1-4/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		2.1	2.2	2.2	2.1
Cadmium, mg/kg		1.6	1.4	1.1	1.3
Chromium, mg/kg		<4	<4	<4	<4
Copper, mg/kg		6	6	6	7
Lead, mg/kg		14	14	14	14
Nickel, mg/kg		12	10	11	11
Zinc, mg/kg		141.5	141.7	141.3	141.1
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

 Respectfully Submitted  
 Swanson Environmental, Inc.



 James Kinscher  
 Chemist



 Norman Crabb, Ph.D.  
 Director

**SWANSON ENVIRONMENTAL INC.**
**ORIGINAL**

 Laboratory Services Division  
 3490 North 127th Street  
 Brookfield, Wisconsin 53005  
 telephone (414) 783-6111

REPORT NUMBER B 2532

**ANALYTICAL REPORT**

 SHIP TO  
 •Swanson Environmental, Inc.  
 24158 Haggerty Road  
 •Farmington Hills, MI 48024  
 •Atten: Steve Ridella

 DATE August 20, 1985  
 PURCHASE ORDER NO. \_\_\_\_\_  
 SEI JOB NO. ME3168/L3800  
 DATE COLLECTED 7-31-85  
 DATE RECEIVED 8-05-85  
 PAGE 3 OF 5
**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-5 BG2-1/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		30.1	29.7	30.6	27.0
Cadmium, mg/kg		1.6	1.3	1.7	1.8
Chromium, mg/kg		9	8	8	8
Copper, mg/kg		13	13	13	13
Lead, mg/kg		20	20	20	20
Nickel, mg/kg		18	18	18	18
Zinc, mg/kg		227.0	226.4	227.3	226.0
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-6 BG2-2/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		3.6	3.6	3.1	3.2
Cadmium, mg/kg		1.6	1.3	1.3	1.6
Chromium, mg/kg		12	12	12	12
Copper, mg/kg		16	16	16	17
Lead, mg/kg		25	25	25	25
Nickel, mg/kg		26	26	26	26
Zinc, mg/kg		113.5	114.7	115.0	115.2
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemon

 Respectfully Submitted  
 Swanson Environmental, Inc.

*J. Kinscher*      *N. Crabb*  
 James Kinscher      Norman Crabb, Ph.D.  
 Chemist      Director

**SWANSON ENVIRONMENTAL INC.**
**ORIGINAL**


Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

**REPORT NUMBER B 2532**
**ANALYTICAL REPORT**

SHIP TO . Swanson Environmental, Inc.  
24158 Haggerty Road  
Farmington Hills, MI 48024  
  
. Atten: Steve Ridella

DATE August 20, 1985

PURCHASE ORDER NO. \_\_\_\_\_

SEI JOB NO. ME3168/L3800

DATE COLLECTED 7-31-85

DATE RECEIVED 8-05-85

PAGE 4 OF 5

**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-7 BG2-3/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		4.1	4.2	4.8	4.5
Cadmium, mg/kg		1.4	1.6	1.2	1.9
Chromium, mg/kg		14	14	15	14
Copper, mg/kg		23	22	23	23
Lead, mg/kg		32	32	24	32
Nickel, mg/kg		33	33	33	33
Zinc, mg/kg		301.0	301.0	302.2	302.0
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-8 BG3-1/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		19.6	21.7	22.4	21.4
Cadmium, mg/kg		1.1	1.2	0.8	0.6
Chromium, mg/kg		8	8	8	8
Copper, mg/kg		11	11	11	10
Lead, mg/kg		21	21	21	21
Nickel, mg/kg		15	15	16	15
Zinc, mg/kg		34.1	34.3	34.1	34.2
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinischer* *Norman Crabb*  
James Kinischer Norman Crabb, Ph.D.  
Chemist Director

**SWANSON ENVIRONMENTAL INC.**
**ORIGINAL**


Laboratory Services Division  
3400 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

**REPORT NUMBER B 2532**
**ANALYTICAL REPORT**

SHIP TO  
TO .Swanson Environmental, Inc.  
24158 Haggerty Road  
.Farmington Hills, MI 48024  
  
.Atten: Steve Ridella

DATE August 20, 1985

PURCHASE ORDER NO. \_\_\_\_\_

SEI JOB NO. ME3168/L3800

DATE COLLECTED 7-31-85

DATE RECEIVED 8-05-85

PAGE 5 OF 5

**Soil Samples (Stanley Tool)**

Parameter	SEI ID Sample ID	3800-9 BG3-2/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		1.2	1.3	1.4	1.1
Cadmium, mg/kg		1.0	1.0	0.8	1.0
Chromium, mg/kg		10	9	9	9
Copper, mg/kg		12	13	13	14
Lead, mg/kg		20	20	20	20
Nickel, mg/kg		19	18	18	19
Zinc, mg/kg		556	560	554	558
Cyanides, Total, mg/kg	1	<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-10 BG3-3/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		4.4	4.5	4.6	4.7
Cadmium, mg/kg		0.8	1.2	1.2	1.4
Chromium, mg/kg		17	16	17	17
Copper, mg/kg		23	22	22	24
Lead, mg/kg		31	31	31	31
Nickel, mg/kg		35	34	36	35
Zinc, mg/kg		602	605	600	603
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher* *N. Crabb*  
James Kinscher Norman Crabb, Ph.D.  
Chemist Director

# SWANSON ENVIRONMENTAL INC.

ORIGINAL



Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

REPORT NUMBER B 2532

## ANALYTICAL REPORT

SHIP TO • Swanson Environmental, Inc.  
24158 Haggerty Road  
Farmington Hills, MI 48024  
Atten: Steve Ridella

DATE August 26, 1985

PURCHASE ORDER NO. \_\_\_\_\_

SEI JOB NO. ME3168/L3800

DATE COLLECTED 7-31-85

DATE RECEIVED 8-05-85

PAGE 1 OF 2

### Soil Samples (Stanley Tool - Duplicate)

Parameter	SEI ID Sample ID	3800-1 BG1-1/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		6.8	7.6	7.3	7.2
Cadmium, mg/kg		1.2	1.2	1.2	1.2
Chromium, mg/kg		10	10	10	10
Copper, mg/kg		11	11	11	11
Lead, mg/kg		12	12	12	12
Nickel, mg/kg		14	14	14	14
Zinc, mg/kg		157	158	158	157
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

Parameter	SEI ID Sample ID	3800-3 BG1-3/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		3.9	3.8	3.4	3.6
Cadmium, mg/kg		2.6	2.4	2.4	2.4
Chromium, mg/kg		18	18	18	18
Copper, mg/kg		22	22	22	21
Lead, mg/kg		28	22	28	28
Nickel, mg/kg		36	37	36	36
Zinc, mg/kg		242	242	242	243
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher* *N. Crabb*  
James Kinscher Norman Crabb, Ph.D.  
Chemist Director



Laboratory Services Division  
3490 North 127th Street  
Brookfield, Wisconsin 53005  
telephone (414) 783-6111

REPORT NUMBER B 2532

## ANALYTICAL REPORT

SHIP TO  
• Swanson Environmental, Inc.  
• 24158 Haggerty Road  
• Farmington Hills, MI 48024  
• Atten: Steve Ridella

DATE August 26, 1985

PURCHASE ORDER NO. \_\_\_\_\_

SEI JOB NO ME3168/L3800DATE COLLECTED 7-31-85DATE RECEIVED 8-05-85PAGE 2 OF 2

## Soil Samples (Stanley Tool - Duplicate)

Parameter	SEI ID Sample ID	3800-4 BG1-4/1st Run	2nd Run	3rd Run	4th Run
Arsenic, mg/kg		3.2	3.3	3.2	3.3
Cadmium, mg/kg		1.4	1.4	1.5	1.3
Chromium, mg/kg		4	4	4	4
Copper, mg/kg		5	5	6	5
Lead, mg/kg		14	14	14	14
Nickel, mg/kg		9	9	9	8
Zinc, mg/kg		152	151	151	152
Cyanides, Total, mg/kg		<0.01	<0.01	<0.01	<0.01

cc: Cathy Clemson

Respectfully Submitted  
Swanson Environmental, Inc.

*J. Kinscher*  
James Kinscher  
Chemist

*N. Crabb*  
Norman Crabb, Ph.D.  
Director

# Professional Service Industries, Inc.

## Michigan Testing Engineers Division

LOG OF SOIL BORING NO.

BG 1

PROJECT Soils Exploration

JOB NO 406-55078

LOCATION Stanley Company

SURFACE ELEV                     

DATE 7-31-85

Fowlerville, Michigan

Sample & Type	Depth	Legend	SOIL DESCRIPTION	Penetration Blows Per Ft	Moisture %	Natural Wt. PCF	Dry Den Wt. PCF	Unc. Comp Strength PSF	Dr %
1	1'0"		Sandy TOPSOIL, black, moist S.T. no 1 Push from 6" to 6'6" R=2'						
2			Silty CLAY, brown, moist						
3	3'0"								
4			Silty SAND, brown, moist S.T. no 2 Push from 3'6" to 6'6" R=3'						
5	5'0"								
6			Silty CLAY, brown and gray						
7			S.T. no 3 Push from 6'6" to 9'6" R=3'						
8									
9	9'0"								
10	9'6"		Sandy, silty CLAY, gray S.T. no 4 Push from 9'6" to 12' R=2'6"						
11			Medium SAND, gray, wet						
12	12'0"								
13			END OF BORING						
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									

TYPE OF SAMPLE  
 0 DISTURBED  
 UL UNDIST. LINEAR  
 ST SHIMBY TUBE  
 SS SPLIT SPOON

REMARKS:

GROUND WATER OBSERVATIONS

G.W. ENCOUNTERED AT	9	FT	6	INS
G.W. ENCOUNTERED AT	17	FT	6	INS
G.W. AFTER COMPLETION	2	FT	6	INS

**Michigan Testing Engineers Division**

LOG OF SOIL 1 NO. BG 2

PROJECT Soils Exploration

JOB NO 406-55078

LOCATION Stanley Company

SURFACE ELEV                     

DATE 7-31-85

Fowlerville, Michigan

Sample & Type	Depth	Legend	SOIL DESCRIPTION	Penetration Blows Per Ft	Moisture %	Natural Wt. PCF	Dry Den Wt. PCF	Unc Comp Strength PCF	Gr %
		6"	Sandy TOPSOIL, black, moist						
1			Sandy silty CLAY, brown, moist						
2			S.T. no 1 Push from 6" to 3'6" R=2'						
3									
4			S.T. no 2 Push from 3'6" to 6'6" R=3'						
5		5'0"							
6			Sandy silty CLAY, gray						
7			S.T. no 3 Push from 6'6" to 9' R=2'6"						
8									
9	8'6"	9'0"	Medium SAND, gray, wet						
10			END OF BORING						
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									

TYPE OF SAMPLE  
 D DISTURBED  
 UL UNDIST LNER  
 ST SHELBY TUBE  
 SS SPLIT SPOON

REMARKS:

GROUND WATER OBSERVATIONS

GW ENCOUNTERED AT 8 FT 6 INS  
 GW ENCOUNTERED AT FT INS  
 F.W. TESTED FOR CONTAMINANTS

# Michigan Testing Engineers Division

LOG OF SOIL BORING NO. BG 3

PROJECT Soils Exploration

JOB NO A06-55078

LOCATION Stanley Company

SURFACE ELEV                      DATE 7-31-85

Fowlerville, Michigan

Sample & Type	Depth	Legend	SOIL DESCRIPTION	Penetration Blows Per Ft	Moisture %	Natural Wt. PCF	Dry Den Wt. PCF	Unc. Comp Strength PSF	Gr %
	1	9"	Sandy black TOPSOIL						
	2		Sandy CLAY, brown, moist						
	3		S.T. no 1 Push from 1' to 4' R=3'						
	4								
	5	5'0"	S.T. no 2 Push from 4' to 7' R=3'						
	6		Sandy CLAY, gray, moist						
	7								
	8		S.T. no 3 Push from 7' to 10' R=3'						
	9	9'0"							
	10	10'0"	SILT and SAND, gray, wet						
	11		END OF BORING						
	12								
	13								
	14								
	15								
	16								
	17								
	18								
	19								
	20								
	21								
	22								
	23								
	24								
	25								

TYPE OF SAMPLE  
 D DISTURBED  
 U1 UNDIST. LINER  
 S1 SHELBY TUBE  
 SS SP. IT SPOON  
 RC ROCK CORE

REMARKS:

GROUND WATER OBSERVATIONS

GW ENCOUNTERED AT	9	FT	0	INS
GW ENCOUNTERED AT		FT		INS
GW AFTER COMPLETION	9	FT		INS



# ANALYTICAL REPORT

ENVIRONMENTAL RESEARCH GROUP, INC.

117 N. FIRST  
ANN ARBOR, MICHIGAN 48104 (313) 662-3104

Project: A4234  
Report Date: 05-12-86

Received  
6/12/86

Client P.O.  
Report: 18543

Samples Recvd: 04-18-86  
Refer Questions To:  
ROBYN WOOLEY

Client:  
STANLEY TOOLS DIVISION  
425 FRANK STREET  
FOWLerville, MI 48836  
Attention: MIKE STOCK

Approved: Barbara J. J. J.

\*\*\*  
Residual Samples Will Be Held  
TWO WEEKS  
\*\*\*

Client I.D.: DW2  
ERG Sample No.: 04/150424  
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, DISSOLVED	ND (0.01)	mg/L
CHROMIUM, DISSOLVED	<0.02	mg/L
COPPER, DISSOLVED	<0.02	mg/L
CYANIDE, TOTAL	<0.01	mg/L
NICKEL, DISSOLVED	<0.05	mg/L
SPECIFIC CONDUCTANCE	900	umho/cm
ZINC, DISSOLVED	1.4	mg/L
pH	7.4	S.U.

Client I.D.: DW55  
ERG Sample No.: 04/150425  
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, DISSOLVED	ND (0.01)	mg/L
CHROMIUM, DISSOLVED	0.02	mg/L
COPPER, DISSOLVED	<0.02	mg/L
CYANIDE, TOTAL	<0.01	mg/L
NICKEL, DISSOLVED	<0.05	mg/L
SPECIFIC CONDUCTANCE	1000	umho/cm
ZINC, DISSOLVED	0.10	mg/L
pH	8.4	S.U.

Client I.D.: DW9S  
ERG Sample No.: 04/150426  
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, DISSOLVED	ND (0.01)	mg/L
CHROMIUM, DISSOLVED	ND (0.02)	mg/L
COPPER, DISSOLVED	<0.02	mg/L
CYANIDE, TOTAL	0.03	mg/L
NICKEL, DISSOLVED	ND (0.05)	mg/L
SPECIFIC CONDUCTANCE	2650	umho/cm



# ANALYTICAL REPORT

ENVIRONMENTAL RESEARCH GROUP, INC.

Project: A4234  
Report Date: 05-12-86

Client I.D.: OW9S  
ERG Sample No.: 04/150426  
Matrix: NATURAL WATER

Parameter	Result	Units
ZINC, DISSOLVED	0.09	mg/L
pH	9.2	S.U.

Client I.D.: OW11S  
ERG Sample No.: 04/150427  
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, DISSOLVED	ND (0.01)	mg/L
CHROMIUM, DISSOLVED	0.02	mg/L
COPPER, DISSOLVED	<0.02	mg/L
CYANIDE, TOTAL	0.01	mg/L
NICKEL, DISSOLVED	0.13	mg/L
SPECIFIC CONDUCTANCE	2200	umho/cm
ZINC, DISSOLVED	8.8	mg/L
pH	6.8	S.U.

Client I.D.: OW12S  
ERG Sample No.: 04/150428  
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, DISSOLVED	ND (0.01)	mg/L
CHROMIUM, DISSOLVED	0.02	mg/L
COPPER, DISSOLVED	<0.02	mg/L
CYANIDE, TOTAL	0.01	mg/L
NICKEL, DISSOLVED	<0.05	mg/L
SPECIFIC CONDUCTANCE	2200	umho/cm
ZINC, DISSOLVED	0.36	mg/L
pH	7.0	S.U.

Client I.D.: OW10S  
ERG Sample No.: 04/150429  
Matrix: NATURAL WATER

Parameter	Result	Units
CADMIUM, DISSOLVED	<0.01	mg/L
CHROMIUM, DISSOLVED	<0.02	mg/L
COPPER, DISSOLVED	<0.02	mg/L
CYANIDE, TOTAL	<0.01	mg/L
NICKEL, DISSOLVED	<0.05	mg/L
SPECIFIC CONDUCTANCE	2400	umho/cm
ZINC, DISSOLVED	0.19	mg/L
pH	8.3	S.U.



# ANALYTICAL REPORT

ENVIRONMENTAL RESEARCH GROUP, INC.

Project: A4234  
Report Date: 05-12-86

Client I.D.: UPSTREAM  
ERG Sample No.: 04/150430  
Matrix: NATURAL WATER

<u>Parameter</u>	<u>Result</u>	<u>Units</u>
CADMIUM, DISSOLVED	ND (0.01)	mg/L
CHROMIUM, DISSOLVED	0.02	mg/L
COPPER, DISSOLVED	<0.02	mg/L
CYANIDE, TOTAL	<0.01	mg/L
NICKEL, DISSOLVED	ND (0.05)	mg/L
SPECIFIC CONDUCTANCE	600	umho/cm
ZINC, DISSOLVED	0.03	mg/L
pH	7.6	S.U.

Client I.D.: DOWNSTREAM  
ERG Sample No.: 04/150431  
Matrix: NATURAL WATER

<u>Parameter</u>	<u>Result</u>	<u>Units</u>
CADMIUM, DISSOLVED	<0.01	mg/L
CHROMIUM, DISSOLVED	<0.02	mg/L
COPPER, DISSOLVED	<0.02	mg/L
CYANIDE, TOTAL	<0.01	mg/L
NICKEL, DISSOLVED	<0.05	mg/L
SPECIFIC CONDUCTANCE	600	umho/cm
ZINC, DISSOLVED	0.02	mg/L
pH	7.7	S.U.

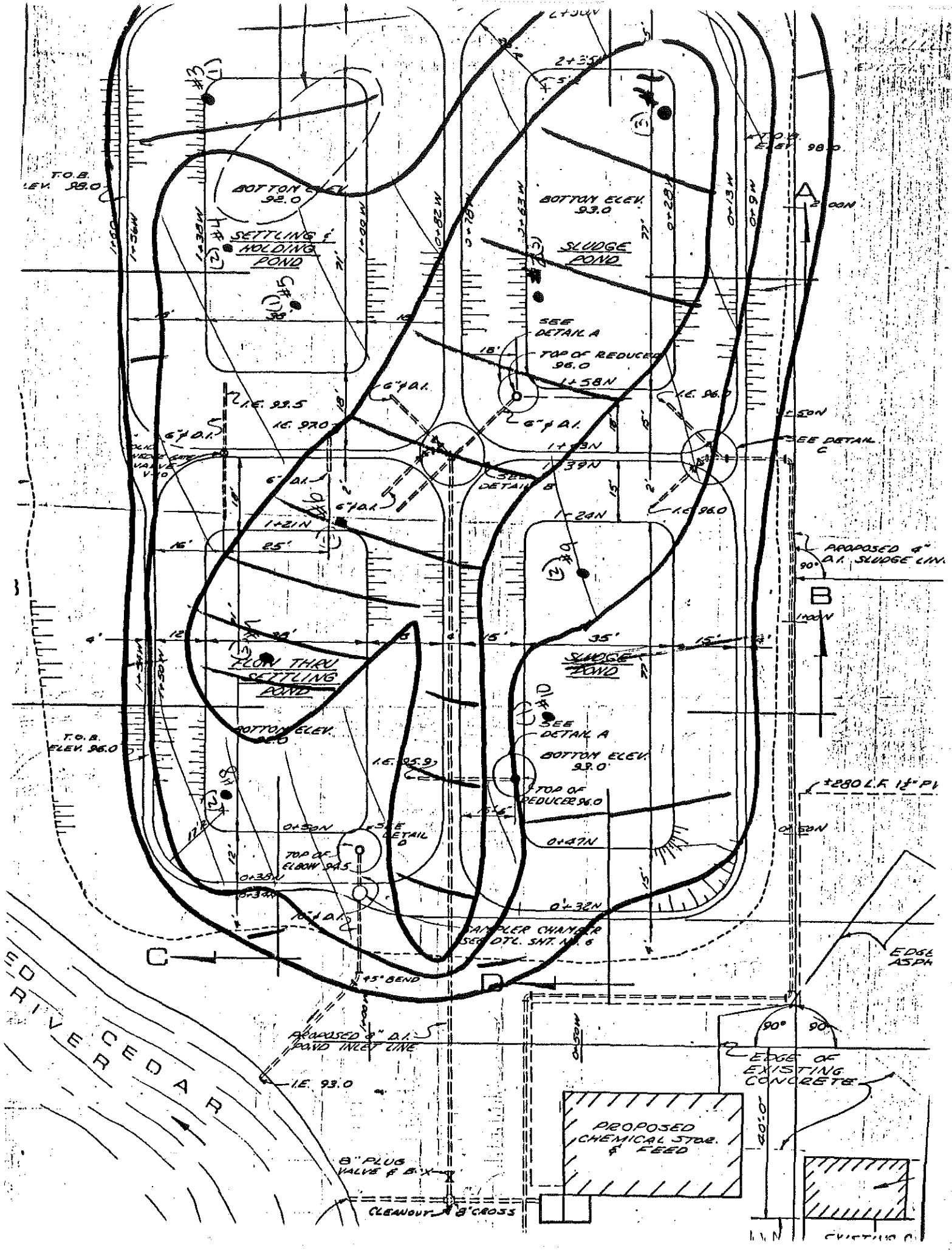
SD-Sample damaged  
FR-See field report for result  
AR-See attached report  
A-Result not applicable to test

ND-Nondetected, Detection limit in ( )  
C-Positive result at an unquantifiable  
concentration below indicated level

Thank you for your business.

Page 3

Last Page



Soil Analyses  
Stanley Tools Fowlerville

	<u>Cu</u>	<u>Zn</u>	<u>Ni</u>	<u>Cr</u>
1-A	29	65	22	25
1-B	11	44	15	10
1-C	21	30	17	14
1-D	16	23	18	17
2-A	84	102	44	52
2-B	49	45	20	17
2-C	27	37	33	16
2-D	25	25	19	14
3-A	24	22	33	7
3-B	16	29	14	6
3-C	11	19	19	10
3-D	10	18	12	8
4-A	116	110	93	128
4-B	54	54	13	27
4-C	25	29	75	13
4-D	14	15	15	6
5-A	8	23	8	5
5-B	26	41	20	17
5-C	14	15	15	6
5-D	11	18	10	8
6-A	780	163	10	192
6-B	12	32	17	12
6-C	44	38	23	21
6-D	21	12	13	11
7-A	84	108	53	62
7-B	23	38	17	11
7-C	71	54	43	18
7-D	50	27	15	14
8-A	37	44	27	33
8-B	80	70	32	36
8-C	19	28	37	12
8-D	11	17	15	10
9-A	88	13	8	10
9-B	31	10	7	5
9-C	31	12	10	5
9-D	16	17	7	8
10-A	35	62	17	20
10-B	24	22	7	8
10-C	15	20	7	8
10-D	18	17	10	6

NOTE: A = surface  
B = 1' below surface  
C = 2' below surface  
D = 3' below surface

All sample results for Pb and Cd were less than detection limits.

Pb <5.0  
Cd <1.5

All results expressed in mg/kg.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:  
5HS-13

SEP 27 1985

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Delia M. Christensen  
Chief Chemist - Environmental Science  
Stanley Laboratory  
1309 Corbin Avenue  
New Britain, Connecticut 06053

RE: Closure Plan  
Stanley Tools - Fowlerville  
MID 099 124 299

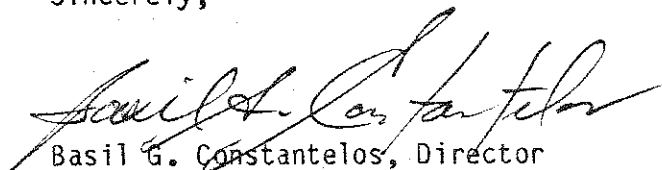
Dear Ms. Christensen:

We have reviewed the closure plan dated March 27, 1985 and the revisions to the plan dated September 20, 1985. These plans are hereby approved subject to the conditions described in the enclosure to this letter. Please be aware that closure does not terminate interim status. A corrective action order may be issued to your facility, if the United States Environmental Protection Agency determines that a release of hazardous waste or hazardous waste constituents is taking or has taken place.

When closure is completed, please submit the certification required by 40 CFR 265.115.

If you have any questions, please contact Mr. Richard Traub of my staff, at (312) 886-6138.

Sincerely,

  
Basil G. Constantelos, Director  
Waste Management Division

cc: Alan J. Howard, MDNR w/enclosure  
John Bohunsky, MDNR w/enclosure

CLOSURE PLAN APPROVAL  
CONDITIONS

1. As of May 8, 1985 the placement of bulk or non-containerized liquid hazardous waste in a landfill is prohibited, even if absorbents have been added. The waste must be stabilized or treated and solidified by other means, prior to its off-site disposal in a landfill.
2. Submit the following within 10 days of determination:
  - grid sampling pattern
  - grid sample point concentrations
  - results of statistical comparison between grid point values and background.

A.4.5

THE STANLEY WORKS

1000 Stanley Drive, New Britain, CT 06053 (203) 225-5111

150 years  
**STANLEY**  
1843-1993

'93 APR 19 P3:06  
OFFICE OF THE  
REGIONAL ADMINISTRATOR

April 13, 1993

Mr. Valdas V. Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

Ms. Julie Belaga  
EPA Region I  
John F. Kennedy Federal Building  
Boston, MA 02203

Dear Regional Administrators:

I enclose herewith the following:

1. a letter signed by the Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265;
2. a copy of the Annual Report of The Stanley Works for the latest completed fiscal year containing a certified public accountant's report on the audit of the consolidated financial statements of The Stanley Works and subsidiaries;
3. a special report from our independent certified public accounts stating that the data cited in the letter from the Chief Financial Officer and specified as having been derived from the independently audited year end consolidated financial statements for the latest fiscal year have been compared with the amounts in such financial statements and that, in connection with that procedure, no matter came to the auditors attention which caused them to believe that the specified data should be adjusted.

Sincerely,

  
William J. Guerrero, Manager  
Corporate Environmental Affairs  
The Stanley Works

## Report of Independent Accountants on Compliance

Board of Directors  
The Stanley Works

We have read the letter to the Environmental Protection Agency signed March 31, 1993 from the Vice President, Finance and Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265, and have compared the data therein specified as having been derived from the independently audited financial statements of The Stanley Works for the fiscal year ended January 2, 1993 with the amounts in such financial statements.

In connection with that procedure, nothing came to our attention that caused us to believe that the specified data should be adjusted.

*Ernst & Young*

March 31, 1993



## THE STANLEY WORKS

1000 Stanley Drive, New Britain, CT 06053 (203) 225-5111

Mr. Valdas V. Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

Ms. Julie Belaga  
EPA Region I  
John F. Kennedy Federal Building  
Boston, MA 02203

I am the Chief Financial Officer of The Stanley Works, 1000 Stanley Drive, New Britain, CT 06050. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Sudden and Non-Sudden Accidental Occurrences  
Stanley Tools - Fowlerville  
EPA ID # MID099124299  
425 Frank Street  
Fowlerville, MI 28836

Sudden Accidental Occurrences  
The Stanley Works - New Britain  
EPA ID# CTD010170363  
195 Lake Street  
New Britain, CT 06050

The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR parts 264 and 265, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following:  
**NONE.**

The firm identified above is: (1) not applicable or **NONE;**  
(2) not applicable or **NONE;** or (3) not applicable or **NONE.**

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care or liability coverage is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post closure cost estimate covered by the test are shown for each facility:

Closure and Post-Closure Care  
EPA ID# MID099124299  
Stanley Tools - Fowlerville  
425 Frank Street  
Fowlerville, MI 48836  
Closure Cost Estimate; \$ 1,452,127  
Post Closure Cost Estimate; \$ 346,720

Closure  
EPA ID# CTD010170363  
The Stanley Works  
195 Lake Street  
New Britain, CT 06050  
Closure Cost Estimate; \$ 297,374

2. The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: NONE.

3. In States where EPA is not administering financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and post-closure cost estimates covered by such a test are shown for each facility: NONE.

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144. The current closure cost estimates as required by 40 CFR Part 144.62 are shown for each facility: NONE.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on January 2. The figures for the following items marked with an asterisk are derived from the firm's independently audited, year-end financial statements for the latest completed fiscal year ended January 2, 1993.

**PART B - CLOSURE AND POST CLOSURE CARE  
AND LIABILITY COVERAGE  
ALTERNATIVE I**

1.	Sum of current closure and post-closure cost estimates.....	\$	2,096,221		
2.	Amount of annual aggregate liability coverage to be demonstrated.....	\$	10,000,000		
3.	Sum of lines 1 & 2.....	\$	12,096,221		
*4.	Total liabilities.....	\$	911,300,000		
*5.	Tangible net worth.....	\$	521,000,000		
*6.	Net worth.....	\$	696,300,000		
*7.	Current assets.....	\$	778,700,000		
*8.	Current liabilities.....	\$	329,900,000		
9.	Net working capital.....	\$	448,800,000		
*10.	The sum of net income plus depreciation, depletion, and amortization.....	\$	176,600,000		
*11.	Total assets in U.S.....	\$	1,002,100,000		
				<u>YES</u>	<u>NO</u>
12.	Is line 5 at least \$10 million?.....		X		
13.	Is line 5 at least 6 times line 3?.....		X		
14.	Is line 9 at least 6 times line 3?.....		X		
*15.	Are at least 90% of assets located in U.S.?				X
16.	Is line 11 at least 6 times line 3?.....		X		
17.	Is line 4 divided by line 6 less than 2.0?		X		
18.	Is line 10 divided line 4 greater than 0.1?		X		
19.	Is line 7 divided by line 8 greater than 1.5?.....		X		

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
R. A. Hunter

Vice President, Finance and Chief Financial Officer

3-31-93  
\_\_\_\_\_  
Date

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

March 28, 1991

(203) 225-5111

Mr. Valdaz Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

D:WMD  
cc:AF

Ms. Julie Belaga  
EPA Region I  
John F. Kennedy Federal Building  
Boston, MA 02203

Dear Regional Administrators:

I enclose herewith the following:

1. a letter signed by the Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265;
2. a copy of the Annual Report of The Stanley Works for the latest completed fiscal year containing a certified public accountant's report on the audit of the consolidated financial statements of The Stanley Works and subsidiaries;
3. a special report from our independent certified public accounts stating that the data cited in the letter from the Chief Financial Officer and specified as having been derived from the independently audited year end consolidated financial statements for the latest fiscal year have been compared with the amounts in such financial statements and that, in connection with that procedure, no matter came to the auditors attention which caused them to believe that the specified data should be adjusted.

RECEIVED

APR 04 1991

U. S. EPA REGION 5  
OFFICE OF REGIONAL ADMINISTRATOR

Sincerely,

  
William J. Guerrero  
Senior Corporate Environmental  
Specialist  
The Stanley Works

**T H E   S T A N L E Y   W O R K S***Since 1843*

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

Mr. Valdaz Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

Ms. Julie Belaga  
EPA Region I  
John F. Kennedy Federal Building  
Boston, MA 02203

I am the Chief Financial Officer of The Stanley Works, 1000 Stanley Drive, New Britain, CT 06050. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Sudden and Non-Sudden Accidental Occurrences  
Stanley Tools - Fowlerville  
EPA ID # MID099124299  
425 Frank Street  
Fowlerville, MI 28836

Sudden Accidental Occurrences  
The Stanley Works - New Britain  
EPA ID# CTD010170363  
195 Lake Street  
New Britain, CT 06050

The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR parts 264 and 265, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following:  
**NONE.**

The firm identified above is: (1) not applicable or **NONE;**  
(2) not applicable or **NONE;** or (3) not applicable or **NONE.**

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care or liability coverage is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post closure cost estimate covered by the test are shown for each facility:

Closure and Post-Closure Care  
EPA ID# MID099124299  
Stanley Tools - Fowlerville  
425 Frank Street  
Fowlerville, MI 48836  
Closure Cost Estimate; \$ 1,356,103  
Post Closure Cost Estimate; \$ 323,792

Closure  
EPA ID# CTD010170363  
The Stanley Works  
195 Lake Street  
New Britain, CT 06050  
Closure Cost Estimate; \$ 307,339

2. The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: NONE.

3. In States where EPA is not administering financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and post-closure cost estimates covered by such a test are shown for each facility: NONE.

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.


5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144. The current closure cost estimates as required by 40 CFR Part 144.62 are shown for each facility: NONE.

The fiscal year of this firm ends on December 29. The figures for the following items marked with an asterisk are derived from the firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 29, 1990.

**PART B - CLOSURE AND POST CLOSURE CARE  
AND LIABILITY COVERAGE  
ALTERNATIVE I**

1.	Sum of current closure and post-closure cost estimates.....	\$	1,987,234
2.	Amount of annual aggregate liability coverage to be demonstrated.....	\$	10,000,000
3.	Sum of lines 1 & 2.....	\$	11,987,234
*4.	Total liabilities.....	\$	797,300,000
*5.	Tangible net worth.....	\$	592,200,000
*6.	Net worth.....	\$	696,500,000
*7.	Current assets.....	\$	744,200,000
*8.	Current liabilities.....	\$	282,400,000
9.	Net working capital.....	\$	461,800,000
*10.	The sum of net income plus depreciation, depletion, and amortization.....	\$	180,900,000
*11.	Total assets in U.S.....	\$	928,200,000
		<u>YES</u>	<u>NO</u>
12.	Is line 5 at least \$10 million?.....	X	
13.	Is line 5 at least 6 times line 3?.....	X	
14.	Is line 9 at least 6 times line 3?.....	X	
*15.	Are at least 90% of assets located in U.S.?		X
16.	Is line 11 at least 6 times line 3?.....	X	
17.	Is line 4 divided by line 6 less than 2.0?	X	
18.	Is line 10 divided line 4 greater than 0.1?	X	
19.	Is line 7 divided by line 8 greater than 1.5?.....	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
R. A. Hunter  
Vice President, Finance and Chief Financial Officer

3-25-91  
\_\_\_\_\_  
Date

**REPORT OF INDEPENDENT ACCOUNTANTS ON COMPLIANCE**

The Stanley Works  
World Headquarters

We have read the letter to the Environmental Protection Agency signed March 25, 1991 from the Vice President, Finance and Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265, and have compared the data therein specified as having been derived from the independently audited financial statements of The Stanley Works for the fiscal year ended December 29, 1990 with the amounts in such financial statements.

In connection with that procedure, nothing came to our attention that caused us to believe that the specified data should be adjusted.

*Ernst & Young*

March 26, 1991

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
MARLENE J. FLUHARTY  
KERRY KAMMER  
O. STEWART MYERS  
DAVID D. OLSON  
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

Region III Headquarters  
P.O. Box 30028, Lansing, MI 48909

April 26, 1990

Mr. William J. Guerrera  
Corporate Environmental Specialist  
The Stanley Works  
1000 Stanley Drive  
New Britain, CT 06050

MID 099 124 299  
Fowlerville, Michigan

Dear Mr. Guerrera:

The Department of Natural Resources staff has evaluated the financial assurance documents submitted to this office for your Fowlerville, Michigan facility.

Based on the information and documents obtained from you on August 1, 1989, March 30, April 23, 1990, and other documents filed with this office, your company has demonstrated financial assurance for closure/post closure and liability coverage by utilizing the Financial Test and Irrevocable Letter of Credit.

These financial assurance documents appear to be adequate and meet the requirements of Part 7 of the Act 64 Administrative Rules, and 40 CFR 264.147(f) of the Resource Conservation and Recovery Act (RCRA).

Thank you for your cooperation in regards to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Leroy Vahovick".

Leroy Vahovick  
Environmental Quality Analyst  
WASTE MANAGEMENT DIVISION  
Lansing District Office  
517-322-5104

LV:aw

FINANCIAL CAPABILITY

Part 7 R299.9701 to R299.9710

Note: Facilities not yet issued an operating license in accordance with Part 5 of these rules shall comply with Financial capability, Part 7, of these rules, by August 14, 1989. Rule 701.(2) Federal and State facilities are exempt from financial capability requirements.

Cost estimate for Closure and Post Closure Care Rule 702(1):

40 CFR 264.142 and 264.144

	Violation Class	Yes	No	N/A
1. Is the written closure cost estimate available and on site? 264.142(d) Note: Indicate the amount:	No met staff at this site	—	—	—
2. Is the written post closure cost estimate available and on site 264.144(d) (Required only for disposal surface impoundment, land treatment, landfill unit or waste pile. Note: Indicate the amount:		—	—	—
	1,556,456	—	—	—
3. a) Have any revisions been made to the closure/post closure plan which increase the cost of closure/post closure? 264.142(c) and 264.144(c).	—	—	✓	—
b) If yes, were the cost estimate(s) revised to reflect this increase within 30 days of approval to modify closure/post closure plan?	—	—	—	—

9-28-89

Violation

Class

Yes

No

N/A

4. Have the closure/post closure cost estimates been adjusted for inflation by either recalculating cost estimates or using an inflation factor derived from the most recent implicit price deflation? 264.142(b) and 264.144(b)

implicit

(JPD)  
1989 Estimate - 1,556,456.00 x 1.0366  
Total assured funds for 1990

✓ \$1,613,422.20

- a) Have closure/post closure cost estimates been revised within 30 days after firm's fiscal year (for facilities using financial test or corporate guarantee)?

✓

- b) For all other financial instruments, have closure/post closure cost estimates been revised within 60 days prior to anniversary date of establishment?

✓

5. Have closure/post closure cost estimates for facilities using financial test or corporate guarantee been revised within 30 days after close of firms fiscal year? 264.142(b) and 264.144(b)

✓

6. For all other financial instruments have closure/post closure cost estimates for facilities been revised within 60 days of their anniversary date of establishment? 264.142(b) and 264.144(b)

✓

7. Have the closure/post closure cost estimates been adjusted by either recalculating cost estimates or using the most recent appropriate inflation factor? 264.142(b) 264.144(b)

\_\_\_\_\_

Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Financial Assurance for Closure/Post Closure Care Rule 703

8. Indicate which of the following financial mechanism(s) are used to establish financial assurance for closure/post closure care Rule 703(1). Also, indicate if its for closure/post closure care Rule 7083 (1).

<u>          </u>	Trust fund Rule 704
<u>          </u>	Surety bond guaranteeing performance of closure/post closure care. Rule 705
<u>✓          </u>	Letter of Credit, Rule 706.
<u>          </u>	Certificate of Deposit or Time Deposit account. Rule 707
<u>          </u>	Closure post/closure insurance Rule 708
<u>✓          </u>	Financial test and corporate guarantee for closure/post closure Rule 709.

	Violation			
	<u>Class</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>

9. If multiple mechanisms are used are they limited to trusts, surety bonds, letters of credit certificates of deposits and insurance? Rule 703(2)

*irrevocable form of credit*  
*Financial Test.*

10. Are financial assurance mechanisms used for more than one facility? Rule 703(3). If so, indicate their names and ID number.

Comments: Fowlerville facility and  
New Britain CT facility

FINANCIAL MECHANISMS

11. Trust fund. Rule 704  
A. Is trust agreement on DNR approved form? Rule 704(1)

                                 ✓

	Violation Class	Yes	No	N/A
B. Is trust funded at 100% closure/post closure cost. Rule 704(2).	_____	_____	_____	_____✓
If no, indicate amount.	_____			
12. Surety Bond Guarantee. Rule 705				
A. Is bond executed on DNR approved form? Rule 705(1)	_____	_____	_____	_____✓
12. B. Is sum of bond equal or greater than closure/post closure costs? Rule 705 (4). If no, indicate amount.	_____	_____	_____	_____✓
13. Letter of Credit Rule 706				
A. Is letter of credit executed on a form approved by Director. Rule 706(1)	_____	_____✓	_____	_____
B. Is letter of credit accompanied by a letter from owner/operator providing the following: EPA ID number; name and address of facility; amount of funds assured for closure/post closure? Rule 706(3)	_____	_____✓	_____	_____
C. Is letter of credit equal to or greater than closure/post closure costs? Rule 706(5) If no, indicate amount.	_____	_____✓	_____	_____
14. Certificate of deposit/time deposit. Rule 707				
A. Is certificate or account in only name of the director? Rule 707(2)	_____	_____	_____	_____✓

	Violation Class	Yes	No	N/A
B. Is there an agreement which identifies reasons which director may cash the certificate or account on a DNR approved form? Rule 707(3)	_____	_____	_____	✓ _____
C. Is certificate for amount equal to closure/post closure cost estimates. Rule 707(4).	_____	_____	_____	✓ _____
If no, indicate amount. _____				
15. Closure/post closure insurance. Rule 708.				
A. Does certificate use wording approved by director; or	_____	_____	_____	✓ _____
B. A certified true and complete copy of the policy. Rule 708(1)	_____	_____	_____	✓ _____
C. Is the closure/post closure insurance policy issued for face amount at least equal to current closure/post closure cost estimate? Rule 708(4). If no, indicate amount.	_____	_____	_____	✓ _____
16. If using multiple assurance mechanisms, do they equal or exceed closure/post closure cost estimates? Rule 703(2).				
Indicate total. _____				

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Violation

Class

Yes

No

N/A

17. Financial test and corporate guarantee, Rule 709. For financial test does the owner operator meet A or B? Rule 709(1)

A. All of the following:

1. Two of the following three ratios:

a. Ratio of liabilities to net worth less than 2. \_\_\_\_\_

b. A ratio of sum of net income plus depreciation depletion and amortization to total liabilities of more than 0.1. \_\_\_\_\_

c. A ratio of current assets to liabilities of more than 1.5. and: \_\_\_\_\_

2. Net working capital and tangible net worth each not less than 6 times the sum of closure and post/closure cost estimates. \_\_\_\_\_

3. Tangible net worth not less than \$10,000,000 and: \_\_\_\_\_

4. Assets in the U.S. not less than 90% of total assets or not less than 6 times the closure/post closure costs and: \_\_\_\_\_

5. Total assets in Michigan not less than \$50,000,000 or not less than 6 times sum of approved closure/post closure cost estimates (larger of the two). \_\_\_\_\_

Net worth 565.5  
liabilities 283.7  
= 1.99

Assets 258  
liab 283  
= 2.6

✓

✓

✓

Comments: \_\_\_\_\_

or all of the following:

	Violation Class	Yes	No	N/A
B. 1. An acceptable Standard and Ppoors or Moody's Rating for the most recent bond issuance.	_____	_____	_____	✓
2. Tangible net worth not less than 6 times the sum of closure/post closure cost estimates.	_____	Not less than	✓	_____
3. Tangible net worth not less than \$10,000,000	_____	✓	_____	_____
4. Assets in the U.S. not less than 90% of total assets or not less than 6 times closure/post closure costs.	_____	✓	_____	_____
5. Total assets in Michigan at least \$50,000,000 or not less than 6 times sum of approved closure/post closure cost estimates (or larger of the two)	_____	✓	_____	_____

Comments: \_\_\_\_\_

18. For financial test and corporate guarantee has the owner operator:  
Rule 709(3)

A. Have a letter signed by chief financial officer and worded as specified by director.

B. A copy of independent CPA report examining owner operators financial statement.

C. A copy of special report by independent CPA stating:

yes

	Violation Class	Yes	No	N/A
1. The Independent CPA compared data from chief financial officer which specifies having derived from the independent audit-year-end financial statement; and	_____	<input checked="" type="checkbox"/>	_____	_____
2. No matters came to their attention indicating the information needs adjustments.	_____	<input checked="" type="checkbox"/>	_____	_____
19. Corporate guarantee. Rule 709.10 Does owner meet requirements of 17 and 18 above; and:				
A. Use wording identical to wording provided by Director.	_____	_____	_____	<input checked="" type="checkbox"/>
B. Does terms of corporate guarantee include:				
1. Appropriate provisions of owner/operator facts to perform final closure	_____	_____	_____	_____
2. Appropriate cancellation provisions.	_____	_____	_____	_____
3. Alternate financial assurance provisions.	_____	_____	_____	_____

Comments: \_\_\_\_\_

Liability Requirements Rule 710  
(Note: When reviewing insurance, do not include amount of deductible coverage)

19. Does owner/operator maintain liability coverage for sudden and accidental occurrences not less than \$1,000,000 per occurrence with an annual aggregate not less than \$2,000,000?  
Rule 710(1)

*Financial Test*

\_\_\_\_\_

	Violation Class	Yes	No	N/A
20. For surface impoundment landfill or land treatment does owner/ operator maintain liability coverage for sudden accidental occurrences not less than \$3,000,000 per occurrence with an annual aggregate of not less than \$6,000,000? Rule 701(2)	_____	_____	_____	✓ _____
21. For the required insurance policy(s) is each policy amended by attachment of an endorsement on a form provided by the Director? and	_____	_____	_____	✓ _____
22. Is insurer licensed to transact business in Michigan?	_____	_____	_____	✓ _____

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

## Letter from Chief Financial Officer

(203) 225-5111

ExM - 168541626

Mr. Valdez Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

O: WMD  
CC: RF

1/27/89

Ms. Julie Belaga  
EPA Region I  
John F. Kennedy Federal Building  
Boston, MA 02203

I am the Chief Financial Officer of The Stanley Works, 1000 Stanley Drive, New Britain, CT 06050. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Sudden and Non-Sudden Accidental Occurrences  
Stanley Tools - Fowlerville  
EPA ID # MID099124299  
425 Frank Street  
Fowlerville, MI 28836

RECEIVED

MAR 28 1990

Sudden Accidental Occurrences  
The Stanley Works - New Britain  
EPA ID# CTD010170363  
195 Lake Street  
New Britain, CT 06050

U. S. EPA REGION 5  
OFFICE OF REGIONAL ADMINISTRATOR

The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR parts 264 and 265, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following:  
NONE.

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-

closure care or liability coverage is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post closure cost estimate covered by the test are shown for each facility:

Closure and Post-Closure Care  
EPA ID# MID099124299  
Stanley Tools - Fowlerville  
425 Frank Street  
Fowlerville, MI 48836  
Closure Cost Estimate; \$1,302,442  
Post Closure Cost Estimate; \$310,980

Closure  
EPA ID# CTD010170363  
The Stanley Works  
195 Lake Street  
New Britain, CT 06050  
Closure Cost Estimate; \$305,300

2. The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: NONE .

3. In States where EPA is not administering financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and post-closure cost estimates covered by such a test are shown for each facility: NONE.

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144. The current closure cost estimates as required by 40 CFR Part 144.62 are shown for each facility: NONE.

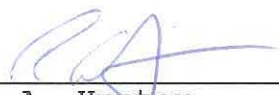
This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 30. The figures for the following items marked with an asterisk are derived from the firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 30, 1989.

PART B - CLOSURE AND POST CLOSURE CARE  
AND LIABILITY COVERAGE  
ALTERNATIVE I

1.	Sum of current closure and post-closure cost estimates.....	\$	1,918,722
2.	Amount of annual aggregate liability coverage to be demonstrated.....	\$	10,000,000
3.	Sum of lines 1 & 2.....	\$	11,918,722
*4.	Total liabilities.....	\$	817,100,000
*5.	Tangible net worth.....	\$	565,500,000
*6.	Net worth.....	\$	674,100,000
*7.	Current assets.....	\$	759,700,000
*8.	Current liabilities.....	\$	283,700,000
9.	Net working capital.....	\$	476,000,000
*10.	The sum of net income plus depreciation, depletion, and amortization.....	\$	187,500,000
*11.	Total assets in U.S.....	\$	963,700,000
		<u>YES</u>	<u>NO</u>
12.	Is line 5 at least \$10 million?.....	X	
13.	Is line 5 at least 6 times line 3?.....	X	
14.	Is line 9 at least 6 times line 3?.....	X	
*15.	Are at least 90% of assets located in U.S.?		X
16.	Is line 11 at least 6 times line 3?.....	X	
17.	Is line 4 divided by line 6 less than 2.0?	X	
18.	Is line 10 divided line 4 greater than 0.1?	X	
19.	Is line 7 divided by line 8 greater than 1.5?.....	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

  
R. A. Hunter

Vice President, Finance and Chief Financial Officer

3-27-90  
Date

## REPORT OF INDEPENDENT ACCOUNTANTS ON COMPLIANCE

The Stanley Works  
World Headquarters

We have read the letter to the Environmental Protection Agency signed March 27, 1990 from the Vice President, Finance and Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265, and have compared the data therein specified as having been derived from the independently audited financial statements of The Stanley Works for the fiscal year ended December 30, 1989 with the amounts in such financial statements.

In connection with that procedure, nothing came to our attention that caused us to believe that the specified data should be adjusted.

*Ernst & Young*

March 27, 1990

# Financial Information

*The Stanley Works and Subsidiaries*

---

## Management Report on Responsibility for Financial Reporting

The management of The Stanley Works is responsible for preparing the accompanying financial statements and for their integrity and objectivity. The statements were prepared in accordance with generally accepted accounting principles applied on a consistent basis. The financial statements include amounts that are based on management's best estimates and judgments. Management also prepared the other information in the Annual Report and is responsible for its accuracy and consistency with the financial statements.

The Company maintains a system of internal accounting controls which is designed to provide reasonable assurance at appropriate cost as to the reliability of financial records and the protection of assets. This system includes monitoring by a staff of internal auditors. It is further characterized by care in the selection of competent financial managers, by organizational arrangements that provide for delegation of authority and divisions of responsibility and by disseminating policies and proce-

dures throughout the Company. The Company also recognizes its responsibility for fostering a strong ethical climate so that the Company's affairs are conducted according to the highest standards of personal and business conduct. This responsibility is characterized and reflected in the Company's Business Conduct Guidelines, which is publicized throughout the organization.

The adequacy of Stanley's internal accounting controls, the accounting principles employed in its financial reporting and the scope of independent and internal audits are reviewed by the Audit Committee of the Board of Directors, consisting of outside directors. Both independent and internal auditors have unrestricted access to the Audit Committee, and they meet with it periodically, with and without management present, to discuss accounting, auditing and financial matters.

The Company has a long-established reputation for integrity in business conduct and maintains a systematic program to assess compliance with these policies.

---

## Report of Ernst & Whinney, Independent Auditors

To the Stockholders  
The Stanley Works  
New Britain, Connecticut

We have examined the consolidated balance sheets of The Stanley Works and subsidiaries as of January 2, 1988 and January 3, 1987, and the related consolidated statements of earnings, changes in stockholders' equity and changes in financial position for each of the three fiscal years in the period ended January 2, 1988. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the consolidated financial position of The Stanley Works and subsidiaries at January 2, 1988 and January 3, 1987, and the consolidated results of their operations and changes in their financial position for each of the three fiscal years in the period ended January 2, 1988, in conformity with generally accepted accounting principles consistently applied during the period except for the change, with which we concur, in the method of accounting for pensions as described in Note I to the consolidated financial statements.

Hartford, Connecticut  
February 4, 1988

*Ernst & Whinney*

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
MARLENE J. FLUHARTY  
KERRY KAMMER  
O. STEWART MYERS  
DAVID D. OLSON  
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

Region III Headquarters  
P.O. Box 30028, Lansing, MI 48909

May 15, 1989

Mr. R. A. Hunter  
Vice President  
Finance and Chief Financial Officer  
The Stanley Works  
New Britain Office  
195 Lake Street  
New Britain, CT 06050

Re: Financial Assurance  
Stanley Tools  
MID 099124299

Dear Mr. Hunter:

The financial assurance document submitted to Mr. Valdez Adamkus, Region V - EPA, and Mr. Michael R. Deland, Region I - EPA, on March 29, 1989 to demonstrate financial responsibility for liability coverage and closure and/or post closure care as specified in Subpart H of 40 CFR Parts 264 and 265 for your Fowlerville facility and the New Britain Connecticut facility has been received at this office for review.

This document is not worded as specified by the Director, and therefore, is not considered adequate, as drafted. The financial test to provide financial assurance for closure and post-closure care in Michigan is different from the test required to satisfy the liability insurance provisions of Rule 710. The financial test to provide financial assurance for closure and post-closure care required under the Act 64 rules is a test specific to Michigan. The test required to satisfy the liability insurance provisions of Rule 710 is the Federal financial test outlined in the provisions of 40 CFR Section 264.147(f) as it existed on December 28, 1985.

Although the financial tests required to satisfy the closure/post closure and liability insurance provisions of Part 7 of the Act 64 rules are different, the method of demonstrating that the facility meets the financial test is similar.

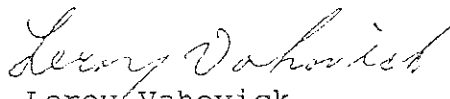
I have enclosed a packet of material, that clearly states the requirements of the financial test provisions of Part 7 of the Act 64 Administrative Rules that apply to Stanley Tools in Fowlerville, Michigan (MID 099124299).

Page Two  
May 16, 1989  
Mr. R. A. Hunter

Please submit to this office by June 9, 1989, the financial test, to demonstrate liability coverage for both sudden and non-sudden accidental occurrences, worded as specified by the Director of the Michigan Department of Natural Resources.

If you have any questions regarding this matter, feel free to contact me.

Sincerely,

  
Leroy Vahovick  
Env. Quality Analyst  
WASTE MANAGEMENT DIVISION  
Lansing District Office  
517-322-5104

LV:mj

Enclosure

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

Letter from Chief Financial Officer

(203) 225-5111

Mr. Valdaz Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

O: WMD -  
CC: RF  
FED.EX. B22993720W

Mr. Michael R. DeLand  
EPA Region I  
John F. Kennedy Federal Building  
Boston, MA 02203

I am the Chief Financial Officer of The Stanley Works, 1000 Stanley Drive, New Britain, CT 06050. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Sudden and Non-Sudden Accidental Occurrences  
Stanley Tools - Fowlerville  
EPA ID # MID099124299  
425 Frank Street  
Fowlerville, MI 28836

RECEIVED

Sudden Accidental Occurrences  
The Stanley Works - New Britain  
EPA ID# CTD010170363  
195 Lake Street  
New Britain, CT 06050

MAR 29 1989  
U. S. EPA REGION 5  
OFFICE OF REGIONAL ADMINISTRATOR

The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR parts 264 and 265, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following:  
NONE.

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-

closure care or liability coverage is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post closure cost estimate covered by the test are shown for each facility:

Closure and Post-Closure Care  
EPA ID# MID099124299  
Stanley Tools - Fowlerville  
425 Frank Street  
Fowlerville, MI 48836  
Closure Cost Estimate; \$1,256,456  
Post Closure Cost Estimate; \$300,000

Closure  
EPA ID# CTD010170363  
The Stanley Works  
195 Lake Street  
New Britain, CT 06050  
Closure Cost Estimate; \$359,375

2. The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: NONE.

3. In States where EPA is not administering financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and post-closure cost estimates covered by such a test are shown for each facility: NONE.

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144. The current closure cost estimates as required by 40 CFR Part 144.62 are shown for each facility: NONE.

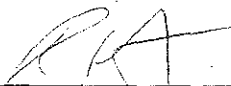
This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from the firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1988.

PART B - CLOSURE AND POST CLOSURE CARE  
AND LIABILITY COVERAGE  
ALTERNATIVE I

1.	Sum of current closure and post-closure cost estimates.....	\$	1,915,831
2.	Amount of annual aggregate liability coverage to be demonstrated.....	\$	10,000,000
3.	Sum of lines 1 & 2.....	\$	11,915,831
*4.	Total liabilities.....	\$	707,332,000
*5.	Tangible net worth.....	\$	599,610,000
*6.	Net worth.....	\$	697,898,000
*7.	Current assets.....	\$	710,451,000
*8.	Current liabilities.....	\$	266,521,000
9.	Net working capital.....	\$	443,930,000
*10.	The sum of net income plus depreciation, depletion, and amortization.....	\$	167,499,000
*11.	Total assets in U.S.....	\$	930,804,000
		<u>YES</u>	<u>NO</u>
12.	Is line 5 at least \$10 million?.....	X	
13.	Is line 5 at least 6 times line 3?.....	X	
14.	Is line 9 at least 6 times line 3?.....	X	
*15.	Are at least 90% of assets located in U.S.?		X
16.	Is line 11 at least 6 times line 3?.....	X	
17.	Is line 4 divided by line 6 less than 2.0? X		
18.	Is line 10 divided line 4 greater than 0.1? X		
19.	Is line 7 divided by line 8 greater than 1.5?.....	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
R. A. Hunter  
Vice President, Finance and Chief Financial Officer  
March 27, 1989  
\_\_\_\_\_  
Date



Ernst & Whinney

One Constitution Plaza  
Hartford, Connecticut 06103

203/247-3100

The Stanley Works  
World Headquarters  
1000 Stanley Drive  
New Britain, Connecticut 06050

We have read the letter to the Environmental Protection Agency signed March 27, 1989 from the Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265, and have compared the data therein specified as having been derived from the independently audited financial statements of The Stanley Works for the fiscal year ended December 31, 1988 with the amounts in such financial statements.

In connection with that procedure, nothing came to our attention that caused us to believe that the specified data should be adjusted.

*Ernst & Whinney*

March 27, 1989

---

# Financial Information

*The Stanley Works and Subsidiaries*

---

## Management Report on Responsibility for Financial Reporting

The management of The Stanley Works is responsible for preparing the accompanying financial statements and for their integrity and objectivity. The statements were prepared in accordance with generally accepted accounting principles applied on a consistent basis. The financial statements include amounts that are based on management's best estimates and judgments. Management also prepared the other information in the Annual Report and is responsible for its accuracy and consistency with the financial statements.

The Company maintains a system of internal accounting controls which is designed to provide reasonable assurance, at appropriate cost, as to the reliability of financial records and the protection of assets. This system includes monitoring by a staff of internal auditors. It is further characterized by care in the selection of competent financial managers, by organizational arrangements that provide for delegation of authority and divisions of responsibility and by disseminating policies and procedures throughout the

Company. The Company also recognizes its responsibility for fostering a strong ethical climate so that the Company's affairs are conducted according to the highest standards of personal and business conduct. This responsibility is characterized and reflected in the Company's Business Conduct Guidelines, which is publicized throughout the organization.

The adequacy of Stanley's internal accounting controls, the accounting principles employed in its financial reporting and the scope of independent and internal audits are reviewed by the Audit Committee of the Board of Directors, consisting of outside directors. Both independent and internal auditors have unrestricted access to the Audit Committee, and they meet with it periodically, with and without management present, to discuss accounting, auditing and financial matters.

The Company has a long-established reputation for integrity in business conduct and maintains a systematic program to assess compliance with these policies.

---

## Report of Ernst & Whinney, Independent Auditors

To the Stockholders  
The Stanley Works  
New Britain, Connecticut

We have audited the accompanying consolidated balance sheets of The Stanley Works and subsidiaries as of December 31, 1988 and January 2, 1988, and the related consolidated statements of earnings, changes in stockholders' equity and cash flows for each of the three fiscal years in the period ended December 31, 1988. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on

a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the consolidated financial position of The Stanley Works and subsidiaries at December 31, 1988 and January 2, 1988, and the consolidated results of their operations and their cash flows for each of the three fiscal years in the period ended December 31, 1988, in conformity with generally accepted accounting principles.

Hartford, Connecticut  
February 2, 1989

*Ernst & Whinney*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

11 APR 1989

5HR-12

Robert Basch, District Supervisor  
Waste Management Division  
Michigan Department of Natural Resources  
P.O. Box 30028  
Lansing, Michigan 48909

Re: Financial Assurance  
Stanley Tools  
MID 099 124 299

Dear Mr. Basch:

The following financial assurance document was submitted to this office for the referenced company:

Financial test to demonstrate liability coverage for both sudden and non-sudden accidental occurrence.

Enclosed is the original document for your financial responsibility review.

I do not believe that this facility has either a Federal permit or order.

If you have any questions, please contact Ron Brown at (312) 886-4463.

Sincerely yours,

*Ronald Brown for*

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

Enclosure

cc: John Bohunsky, MDNR - Lansing, w/o encl.

11 APR 1989

5HR-12

Robert Basch, District Supervisor  
Waste Management Division  
Michigan Department of Natural Resources  
P.O. Box 30028  
Lansing, Michigan 48909

Re: Financial Assurance  
Stanley Tools  
MID 099 124 299

Dear Mr. Basch:

The following financial assurance document was submitted to this office for the referenced company:

Financial test to demonstrate liability coverage for both sudden and non-sudden accidental occurrence.

Enclosed is the original document for your financial responsibility review.

I do not believe that this facility has either a Federal permit or order.

If you have any questions, please contact Ron Brown at (312) 886-4463.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

Enclosure

cc: John Bohunsky, MDNR - Lansing, w/o encl.

R.BROWN:or:04/10/89: Disk#2:PC FILENAME:ROBASCH

04/10/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE		PCB acting 4-10-89	

Region III Headquarters  
P.O. Box 30028, Lansing, MI 48909

April 6, 1989

Mr. William Guerrera  
Corp. Env. Specialist  
The Stanley Works  
Corporate Risk Management  
1000 Stanley Drive  
New Britain, CT 06050

Re: MID 099124299

Dear Mr. Guerrera:

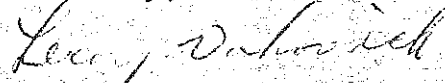
Our office has received your letters dated February 17, 1989, March 27, 1989, and March 31, 1989 in which you provided the necessary financial assurance documents, requested by this office.

The letter from the Chief Financial Officer of the Stanley Works, appears to demonstrate the required financial responsibility for liability coverage and closure and/or post closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

I am providing you with the financial test provisions of Part 7 of the Act 64 Administrative Rules (December 1985) (enclosed) for your information. These regulations require that all treatment, storage and disposal facilities which have not yet been issued an operating license, have until July 14, 1989 to comply with the financial assurance requirements of Michigan's Act 64, Part 7 of the rules.

If you have any questions, please feel free to contact me.

Sincerely,



Leroy Nahovick  
Env. Quality Analyst  
Lansing District Office  
Waste Management Division  
517-322-5104

LV:mj

Enclosure

*2400000000*

Region III Headquarters  
P.O. Box 30028, Lansing, MI 48909

March 28, 1989

The Stanley Works  
Corporate Risk Management  
1000 Stanley Drive  
New Britain, CT 06050

Re: MID 099124299

Dear Mr. Guerrero:

Our office has received your letter dated February 22, 1989 containing the amended version of the letter that was telefaxed to this office on February 17, 1989. This amended copy clarifies one point in question regarding the closure cost estimates for your facility at Fowlerville.

However, the financial assurance (responsibility) for liability coverage as well as closure and post closure costs has not been adequately demonstrated by Stanley Works, as required by Part 7 of Michigan's Act 64 Administrative Rules. You commented in your letter that you had reviewed the Part 7 Financial requirements of Act 64 and stated that Subrule 2, Rule 701 clearly states that treatment, storage, and disposal facilities authorized to operate under these rules, which have not yet been issued an operating license under the act, are not subject to this part.

Please be reminded that these regulations require that all TSDF's which have not yet been issued an operating license, have until July 14, 1989 to comply with the financial assurance requirements of Act 64, Part 7 of the rules.

You are subject to the federal financial assurance requirements at this time. 40 CFR 264.143 states in part that all owners and operators of hazardous waste facilities must provide financial assurance for closure of their facility. The options you may select are specified in (a) through (f) of this section. Since you have not yet closed, this requirement does apply to your facility at Fowlerville.

I suggest that you comply with the Act 64 financial assurance requirements at this time, rather than providing financial documents now for the Federal regulations, and then submitting another packet of financial documents to satisfy the Act 64 regulations that go into affect on July 14, 1989.

✓

Page Two

March 28, 1989

Mr. William Guerrero

We once again, request that you respond by April 14, 1989 with the required financial assurance documents (Federal or Act 64) for your interim status facility. Such documents must be directed to the Director of the Department of Natural Resources.

If you have any questions, please feel free to contact me.

Sincerely,

*Leroy Vahovick*  
Leroy Vahovick  
Env. Quality Analyst  
Waste Management Division  
Lansing District Office  
517-322-5104

LV:mj

**STANLEY**

RECEIVED  
APR 06 1989  
REGION III HEADQUARTERS

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

March 31, 1989

Department of Natural Resources  
Leroy Vahovick, Env. Quality Analyst  
Region III Headquarters  
P.O. Box 30028, Lansing, MI 48909

Re: Financial Assurances

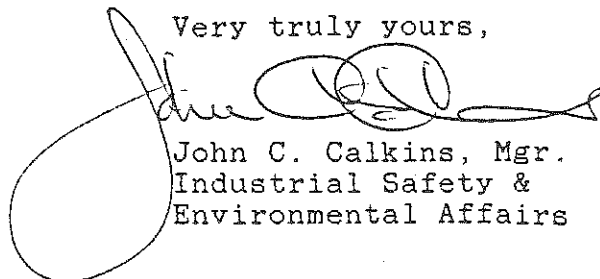
Dear Mr. Vahovick,

I received your letter dated March 28, 1989. Please be advised that a copy of the financial assurance required under 40 CFR 264. was sent directly to the Director of the Michigan, Department of Natural Resources on March 27, 1989.

We will further evaluate the requirements under Michigan's Act 64 and if necessary file the necessary assurances within the specified time (prior to July 14, 1989). A filing under Act 64 would not relieve us of the responsibility of filing under 49 CFR 264 and thusly, we fail to understand your suggestion that we complete the Act 64 filing in place of the Federal requirement.

In any event, it is clear that Stanley has demonstrated to all, it's willingness and financial where-with-all to assure that closure and post closure care of the Fowlerville facility are conducted in accordance with all regulatory requirements. I trust this meets with your current approval, should you have any questions, please feel free to contact me.

Very truly yours,



John C. Calkins, Mgr.  
Industrial Safety &  
Environmental Affairs

cc W. Guerrero

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

RECEIVED

MAR 30 1989

(203)-225-5111

March 27, 1989

Michigan Dept. of Natural Resources  
Permit Section  
Region III Headquarters  
P. O. Box 30028  
Lansing, MI 48909

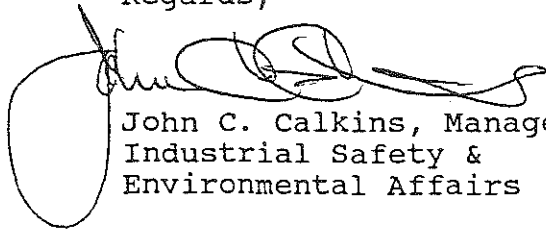
Attention: David F. Hales  
Director

Re: Financial Assurances, 40 CFR Part 265

Dear Mr. Hales:

Please find enclosed for your convenience and file record a copy of our financial assurance for our facility located at 425 Frank Street, Fowlerville, MI 48836 as filed with the Michigan Department of Natural Resources, Region V.

Regards,



John C. Calkins, Manager  
Industrial Safety &  
Environmental Affairs

pw\calkins\MIDNR

cc: John A. Schiavone  
Stanley Corporate Laboratory

The Story works - Fowler  
MID 009 127 299

DRAFT

FINANCIAL CAPABILITY

Part 7 R299.9701 to R299.9710.

Note: Facilities not yet issued an operating license in accordance with Part 5 of these rules shall comply with Financial capability, Part 7, of these rules, by July 14, 1989. Rule 701.(2) Federal and State facilities are exempt from financial capability requirements.

Cost estimate for Closure and Post Closure Care Rule 702(1):

40 CFR 264.142 and 264.144

- |  | Violation<br><u>Class</u> | <u>Yes</u>                          | <u>No</u> | <u>N/A</u> |
|--|---------------------------|-------------------------------------|-----------|------------|
| 1. Is the written closure cost estimate available? 264.142 (2). Note: Indicate the amount:   |                           | <input checked="" type="checkbox"/> |           |            |
|  |                           | 1,256,456                           |           |            |
| 2. Is the written post closure cost available? 262.144(a) (Required only for disposal <u>surface impoundment</u> , land treatment, landfill unit or waste pile. Note: Indicate the amount: |                           |                                     |           |            |
|  |                           | disposal surface impoundment        |           |            |
|  |                           | 300,000                             |           |            |
| 3. Have any revisions been made to the closure/post closure cost estimates which increase the cost of closure/post closure? 264.142(c) and 264.144(c).                                     |                           | <input checked="" type="checkbox"/> |           |            |
| 4. Have closure/post closure cost estimates been revised to reflect any increase in costs? 264.142(d) and 264.14(d)  |                           | <input checked="" type="checkbox"/> |           |            |

3-10-89

Need a copy of  
this sent to  
EPA for LDF!  
only need a  
✓ separate  
copy

- |   | Violation<br>Class | Yes                                 | No    | N/A-  |
|---|--------------------|-------------------------------------|-------|-------|
| 5. Have closure/post closure cost estimates for facilities using financial test <sup>4</sup> or corporate guarantee been revised within 30 days after close of firms fiscal year? 264.142(b) and 264.144(b) | _____              | <input checked="" type="checkbox"/> | _____ | _____ |
| 6. For all other financial instruments have closure/post closure cost estimates for facilities been revised within 60 days of their anniversary date of establishment? 264.142(b) and 264.144(b)            | _____              | <input checked="" type="checkbox"/> | _____ | _____ |
| 7. Have the closure/post closure cost estimates been adjusted by <u>either</u> recalculating cost estimates or using the most recent appropriate inflation factor? 264.142(b) 264.144(b)                    | _____              | <input checked="" type="checkbox"/> | _____ | _____ |

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

#### Financial Assurance for Closure/Post Closure Care Rule 703

8. Indicate which of the following financial mechanism(s) are used to establish financial assurance for closure/post closure care Rule 703(1). Also, indicate if its for closure/post closure care Rule 7063 (1).

\_\_\_\_\_ Trust fund Rule 704

\_\_\_\_\_ Surety bond guaranteeing performance of closure/post closure care. Rule 705

\_\_\_\_\_ Letter of Credit, Rule 706.

Violation

Class Yes No N/A

Certificate of Deposit or Time Deposit  
account. Rule 707

Closure post/closure insurance Rule 708

Financial test and corporate guarantee for  
closure/post closure Rule 709.

9. If multiple mechanisms are  
used are they limited to  
trusts, surety bonds, letters  
of credit certificates of  
deposits and insurance?  
Rule 703(2)

10. Are financial assurance  
mechanisms used for more  
than one facility?  
Rule 703(3). If you indi-  
cate their names and ID  
number.

Comments: Stanley Tools - Fowlerville MD 029 124 299

The Stanley Works, New Britain, CT. CTD 010 170 363

FINANCIAL MECHANISMS

11. Trust fund. Rule 704

A. Is trust agreement on  
DNR approved form?  
Rule 704(1)

B. Is trust funded at 100%  
closure/post closure cost.  
Rule 704(2).

If no, indicate amount.

12. Surety Bond Guarantee.  
Rule 705

A. Is bond executed on DNR  
approved form?  
Rule 705(1)

		Violation Class	Yes	No	N/A
12.	B. Is sum of bond equal or greater than closure/post closure costs? Rule 705 (4). If no, indicate amount.	_____	_____	_____	_____
13.	Letter of Credit Rule 706				
	A. Is letter of credit executed on a form approved by Director. Rule 706(1)	_____	_____	_____	_____
	B. Is letter of credit accompanied by a letter from owner/operator providing the following: EPA ID number; name and address of facility; amount of funds assured for closure/post closure? Rule 706(3)	_____	_____	_____	_____
	C. Is letter of credit equal to or greater than closure/post closure costs? Rule 706(5) If no, indicate amount.	_____	_____	_____	_____
14.	Certificate of deposit/time deposit. Rule 707				
	A. Is certificate or account in only name of the director? Rule 707(2)	_____	_____	_____	_____
	B. Is there an agreement which identifies reasons which director may cash the certificate or account on a DNR approved form? Rule 707(3)	_____	_____	_____	_____
	C. Is certificate for amount equal to closure/post closure cost estimates. Rule 707(4). If no, indicate amount.	_____	_____	_____	_____

		Violation Class	Yes	No	N/A
15.	Closure/post closure insurance. Rule 708.				
A.	Does certificate use wording approved by director; or	_____	_____	_____	_____
B.	A certified true and complete copy of the policy. Rule 708(1)	_____	_____	_____	_____
C.	Is the closure/post closure insurance policy issued for face amount at least equal to current closure/post closure cost estimate? Rule 708(4). If no, indicate amount.	_____	_____	_____	_____
16.	If using multiple assurance mechanisms, do they equal or exceed closure/post closure cost estimates? Rule 703(2).	_____	_____	_____	_____
	Indicate total.	_____	_____	_____	_____
Comments: _____					
_____					
_____					
17.	Financial test and corporate guarantee. Rule 709. For financial test does the owner operator meet A or B? Rule 709(1)				
A.	Two of the following three ratios:				
1.	Ratio of liabilities to net worth less than 2.	_____	✓	_____	_____
2.	A ratio of sum of net income plus depreciation depletion and amortization to total liabilities of more than 0.1.	_____	✓	_____	_____

	Violation Class	Yes	No	N/A
3. A ratio of current assets to liabilities of more than 1.5. and:	_____	<input checked="" type="checkbox"/>	_____	_____
4. Net working capital and tangible net worth each not less than 6 times the sum of closure and post/closure cost estimates.	_____	<input checked="" type="checkbox"/>	_____	_____
5. Tangible net worth not less than \$10,000,000 and:	_____	<input checked="" type="checkbox"/>	_____	_____
6. Assets in the U.S. not less than 90% of total assets or not less than 6 times the closure/post closure costs and:	_____	<input checked="" type="checkbox"/>	_____	_____
7. Total assets in Michigan not less than \$50,000,000	_____	<i>Not less than 50,000,000</i>		

Comments: \_\_\_\_\_

or all of the following:

- B.
1. An acceptable Standard and Poors or Moody's Rating for the most recent bond issuance. \_\_\_\_\_
  2. Tangible net worth not less than 6 times the sum of closure/post closure cost estimates. \_\_\_\_\_
  3. Tangible net worth not less than \$10,000,000 \_\_\_\_\_
  4. Assets in the U.S. not less than 90% of total assets or not less than 6 times closure/post closure costs. \_\_\_\_\_

	Violation Class	Yes	No	N/A
5. Total assets in Michigan at least \$50,000,000		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

18. For financial test and corporate  
guarantee has the owner operator:  
Rule 709(3)

A. Have a letter signed by  
chief financial officer  
and worded as specified by  
director.

B. A copy of independent CPA  
report examining owner  
operators financial  
statement.

C. A copy of special report  
by independent CPA stating:

1. The Independent CPA  
compared data from chief  
financial officer which  
specifies having derived  
from the independent audit-  
year-end financial state-  
ment; and

2. No matters came to their  
attention indicating the  
information needs  
adjustments.

19. Corporate guarantee. Rule 709.10  
Does owner meet requirements of  
17 and 18 above; and:

A. Use wording identical to  
wording provided by  
Director.

	Violation Class	Yes	No	N/A
B. Does terms of corporate guarantee include:				
1. Appropriate provisions of owner/operator facts to perform final closure.	_____	_____	_____	_____
2. Appropriate cancellation provisions.	_____	_____	_____	_____
3. Alternate financial assurance provisions.	_____	_____	_____	_____

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

#### Liability Requirements Rule 710

- |  |       |       |       |       |
|--|-------|-------|-------|-------|
| 19. Does owner/operator maintain liability coverage for sudden and accidental occurrences not less than \$1,000,000 per occurrence with an annual aggregate not less than \$2,000,000? Rule 710(1)   | _____ | _____ | _____ | _____ |
| 20. For surface impoundment landfill or land treatment does owner/operator maintain liability coverage for sudden accidental occurrences not less than \$3,000,000 per occurrence with an annual aggregate of not less than \$6,000,000? Rule 701(2) | _____ | _____ | _____ | _____ |
| 21. For the required insurance policy(s) is each policy amended by attachment of an endorsement on a form provided by the Director? and  | _____ | _____ | _____ | _____ |

Violation

Class    Yes    No    N/A

22. Is insurer licensed to  
transact business in  
Michigan?

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

Letter from Chief Financial Officer

(203) 225-5111

Mr. Valdaz Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

Mr. Michael R. DeLand  
EPA Region I  
John F. Kennedy Federal Building  
Boston, MA 02203

I am the Chief Financial Officer of The Stanley Works, 1000 Stanley Drive, New Britain, CT 06050. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Sudden and Non-Sudden Accidental Occurrences  
Stanley Tools - Fowlerville  
EPA ID # MID099124299  
425 Frank Street  
Fowlerville, MI 28836

Sudden Accidental Occurrences  
The Stanley Works - New Britain  
EPA ID# CTD010170363  
195 Lake Street  
New Britain, CT 06050

The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR parts 264 and 265, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following:  
NONE.

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-

closure care or liability coverage is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post closure cost estimate covered by the test are shown for each facility:

Closure and Post-Closure Care  
EPA ID# MID099124299  
Stanley Tools - Fowlerville  
425 Frank Street  
Fowlerville, MI 48836  
Closure Cost Estimate; \$1,256,456  
Post Closure Cost Estimate; \$300,000

Closure  
EPA ID# CTD010170363  
The Stanley Works  
195 Lake Street  
New Britain, CT 06050  
Closure Cost Estimate; \$359,375

2. The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: NONE .

3. In States where EPA is not administering financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and post-closure cost estimates covered by such a test are shown for each facility: NONE.

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144. The current closure cost estimates as required by 40 CFR Part 144.62 are shown for each facility: NONE.


This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from the firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1988.

PART B - CLOSURE AND POST CLOSURE CARE  
AND LIABILITY COVERAGE  
ALTERNATIVE I

1.	Sum of current closure and post-closure cost estimates.....	\$	1,915,831
2.	Amount of annual aggregate liability coverage to be demonstrated.....	\$	10,000,000
3.	Sum of lines 1 & 2.....	\$	11,915,831
*4.	Total liabilities.....	\$	707,332,000
*5.	Tangible net worth.....	\$	599,610,000
*6.	Net worth.....	\$	697,898,000
*7.	Current assets.....	\$	710,451,000
*8.	Current liabilities.....	\$	266,521,000
9.	Net working capital.....	\$	443,930,000
*10.	The sum of net income plus depreciation, depletion, and amortization.....	\$	167,499,000
*11.	Total assets in U.S.....	\$	930,804,000
		<u>YES</u>	<u>NO</u>
12.	Is line 5 at least \$10 million?.....	X	
13.	Is line 5 at least 6 times line 3?.....	X	
14.	Is line 9 at least 6 times line 3?.....	X	
*15.	Are at least 90% of assets located in U.S.?		X
16.	Is line 11 at least 6 times line 3?.....	X	
17.	Is line 4 divided by line 6 less than 2.0?	X	
18.	Is line 10 divided line 4 greater than 0.1?	X	
19.	Is line 7 divided by line 8 greater than 1.5?.....	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
R. A. Hunter  
Vice President, Finance and Chief Financial Officer  
March 27, 1989  
\_\_\_\_\_  
Date



One Constitution Plaza  
Hartford, Connecticut 06103  
203/247-3100

The Stanley Works  
World Headquarters  
1000 Stanley Drive  
New Britain, Connecticut 06050

We have read the letter to the Environmental Protection Agency signed March 27, 1989 from the Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265, and have compared the data therein specified as having been derived from the independently audited financial statements of The Stanley Works for the fiscal year ended December 31, 1988 with the amounts in such financial statements.

In connection with that procedure, nothing came to our attention that caused us to believe that the specified data should be adjusted.

*Ernst & Whinney*

March 27, 1989

# Financial Information

*The Stanley Works and Subsidiaries*

## Management Report on Responsibility for Financial Reporting

The management of The Stanley Works is responsible for preparing the accompanying financial statements and for their integrity and objectivity. The statements were prepared in accordance with generally accepted accounting principles applied on a consistent basis. The financial statements include amounts that are based on management's best estimates and judgments. Management also prepared the other information in the Annual Report and is responsible for its accuracy and consistency with the financial statements.

The Company maintains a system of internal accounting controls which is designed to provide reasonable assurance, at appropriate cost, as to the reliability of financial records and the protection of assets. This system includes monitoring by a staff of internal auditors. It is further characterized by care in the selection of competent financial managers, by organizational arrangements that provide for delegation of authority and divisions of responsibility and by disseminating policies and procedures throughout the

Company. The Company also recognizes its responsibility for fostering a strong ethical climate so that the Company's affairs are conducted according to the highest standards of personal and business conduct. This responsibility is characterized and reflected in the Company's Business Conduct Guidelines, which is publicized throughout the organization.

The adequacy of Stanley's internal accounting controls, the accounting principles employed in its financial reporting and the scope of independent and internal audits are reviewed by the Audit Committee of the Board of Directors, consisting of outside directors. Both independent and internal auditors have unrestricted access to the Audit Committee, and they meet with it periodically, with and without management present, to discuss accounting, auditing and financial matters.

The Company has a long-established reputation for integrity in business conduct and maintains a systematic program to assess compliance with these policies.

## Report of Ernst & Whinney, Independent Auditors

To the Stockholders  
The Stanley Works  
New Britain, Connecticut

We have audited the accompanying consolidated balance sheets of The Stanley Works and subsidiaries as of December 31, 1988 and January 2, 1988, and the related consolidated statements of earnings, changes in stockholders' equity and cash flows for each of the three fiscal years in the period ended December 31, 1988. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on

a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the consolidated financial position of The Stanley Works and subsidiaries at December 31, 1988 and January 2, 1988, and the consolidated results of their operations and their cash flows for each of the three fiscal years in the period ended December 31, 1988, in conformity with generally accepted accounting principles.

*Ernst & Whinney*

Hartford, Connecticut  
February 2, 1989

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

February 22, 1989

Mr. Leroy Vahovick  
Michigan Department of Natural Resources  
State Secondary Complex  
General Office Building  
P.O. Box 30028  
Lansing, Michigan 30028

RECEIVED  
FEB 28 1989  
REGION III HEADQUARTERS

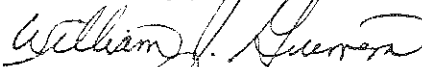
Re: Stanley Tools - Fowlerville, MI  
EPA ID# MID099124299  
Closure/Post-closure Care Cost  
Estimates Amended Submission

Dear Mr. Vahovick:

Enclosed please the amended version of the letter that was telefaxed to you on February 17, 1989. As we discussed in our phone conversation on Wednesday, February 22, the telefaxed copy contained a typographical error in the 3rd paragraph, the dates specified should have been 1987 - 1988 not 1986 - 1987 as written. The amended copy reflects this change. I apologize for any inconvenience this may have caused you.

If you have any further questions or believe that further action needs to be taken please do not hesitate to contact me.

Sincerely,



William J. Guerrera  
Corp. Environmental Specialist  
The Stanley Works  
Corporate Risk Management  
1000 Stanley Drive  
New Britain, CT 06050  
(203) 827-3802

**STANLEY**

# THE STANLEY WORKS

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

February 20, 1989

Mr. LeRoy Vahovick  
Michigan Department of Natural Resources  
State Secondary Complex  
General Office Building  
P.O. Box 30028  
Lansing, Michigan 30028

Re: Stanley Tools - Fowlerville, MI  
EPA ID# MID099124299  
Closure/Post-closure Care Cost  
Estimates

Dear Mr. Vahovick:

As requested enclosed please find a copy of the closure and post-closure care cost estimates prepared for the Stanley Tools - Fowlerville, Michigan facility. Stanley Tools is a division of The Stanley Works (Stanley). Stanley Tools discontinued manufacturing operations at the Fowlerville facility in 1985.

On October 7, 1985, Stanley Tools ceased adding waste to the surface impoundments and initiated closure of the impoundments under interim status guidelines.

The closure cost estimate indicated in the most recent financial test prepared by Stanley, to demonstrate Financial Assurance (responsibility) for liability coverage as well as closure and post-closure care costs, was derived from the summation of actual closure costs incurred to date multiplied by the GNP Implicit Price Deflator for the years 1987 - 1988. The post-closure care estimate was developed by our technical consultant Dames & Moore. That value is based upon the use of six wells to monitor the closed units for a variety of parameters on a quarterly basis over a thirty year time frame.

In our phone conversation and again in your letter you mention that Stanley must demonstrate Financial Assurance for closure and post-closure liability coverage in accordance with Part 7 of Michigan's Act 64 Administrative Rules.

Mr. Leroy Vahovick  
February 20, 1989  
Page Two

We have reviewed the information which you have provided on Part 7 Financial Capability and have concluded that Stanley is not subject to the financial capability requirements set forth in those rules. Subrule 2 of Rule 701 (R299.9701 Applicability) clearly states that "treatment, storage, or disposal facilities authorized to operate under these rules which have not yet been issued an operating license under the Act are not subject to this part."

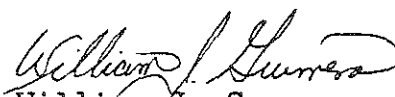
*interim status req under RCRA*

As previously discussed, the Stanley Tools - Fowlerville facility has operated under interim status throughout its active life. A final operating permit (operating license) for the facility was never issued. Accordingly, the Stanley Tools - Fowlerville facility would appear to be expressly exempted from the requirements of Part 7, by Rule 701(2), and therefore subject to the Federal interim status financial assurance requirements only.

Our conclusion in this regard was confirmed by Jim Roberts of the Michigan DNR Hazardous Waste Management Division Central office via a telephone conversation on February 1, 1989.

If you have any further questions, however, or if you believe that additional action needs to be taken, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,



William J. Guerrero  
Corp. Environmental Specialist  
The Stanley Works  
Corporate Risk Management  
1000 Stanley Drive  
New Britain, CT 06050  
(203) 827-3802

cc: B.J. Bemben  
J.C. Calkins  
A.C. Hurley

\\fowl\mdnr\tfv026.wjg  
:enclosure

KEY TO ATTACHMENT PAGES

- ATTACHMENT I - ORIGINAL CLOSURE COST ESTIMATE PREPARED BY  
ENVIRON CORPORATION IN 1985 AS PER CLOSURE PLAN.
- ATTACHMENT II - STANLEY INTER-OFFICE MEMO INDICATING CHARGES  
INCURRED IN 1985 (\$563,830.50) AND ANTICIPATED  
ADDITIONAL COSTS FOR 1986 (\$620,500) TO MEET  
MDNR/EPA CLEAN STANDARDS FOR CLOSURE.  
P.O. 75722-3 STANLEY TOOLS - FOWLerville SURFACE  
IMPOUNDMENT CLOSURE PROJECT
- TOTAL AMOUNT BUDGETED/INCURRED - \$ 1,184,330
- ATTACHMENT III - POST-CLOSURE CARE COST ESTIMATE UPDATED BY DAMES  
& MOORE ON 1/23/89.

## APPENDIX 1

## CLOSURE COST ESTIMATE

1. Remove Fence (800 LF)	1,085
2. Construct Sediment Fence (850 LF)	500
3. Remove Manhole (1), Buried Pipelines (570 LF), Risers (2), Culverts (6), and Monitoring Wells (4)	1,500
4. Pump, Transport and Dispose Sludge (434,000 gal @ \$.29/gal)	125,860
5. Remove Internal Dikes (4800 CY)	7,200
6. Scrape or Drag Impoundment Area (1 acre, 1600 CY)	3,680
7. Test Soils (40 samples @ \$133/sample + \$650)	5,970
8. Transport and Disposal of Sludge & Contaminated Soil (6400 CY of soil @ \$42/CY)	268,800
9. Bring and Place Clean Fill (13,500 CY @ \$5.50/CY)	74,250
10. Grade (crown in center, slope to drain)	2,500
11. Seed and Mulch (1 acre, sown twice)	2,000
12. Reset Fence (500 LF)	2,250
13. Decontaminate Equipment	500
14. Inspections and Certification by Professional Engineer	<u>2,000</u>
TOTAL = \$	498,095

STANLEY

INTER-OFFICE CORRESPONDENCE

STANLEY

September 15, 1986

To: M. Look  
CC: D. Elher

Change order for Stanley Tools - Fowlerville P.O. 75722-3

Charges to P.O. 1985

gallons	332,500	0.45/gal	149,625.00
yards	1,000	90.00/yd	90,000.00
	2,258	86.00/yd	194,188.00
truckloads	128	560.00/truck	71,680.00
project costs			58,337.50
		<u>TOTAL</u>	<u>563,830.50</u>

Sampling of the lagoon after removal of contaminated soil indicated that an additional 1 to 3 feet of soil had to be removed to meet the EPA/MDNR clean standards for closure. Extreme weather conditions postponed the completion of closure until 1986.

Additional costs to complete closure as follows:

yards	3900	135.00/yd	526,500
soil	5000	10.00/yd	50,000
labor	loader	650.00/day	13,000
	supervisor	500.00/day	5,000

waterblasting

foreman	325.00/day	6,500
labor	250.00/day	5,000
waterblaster	125.00/day	2,500
liners	25.00/truck	2,500
		<u>34,500</u>

Report, certification, testing	9,500
--------------------------------	-------

TOTAL 620,500

Cost of disposal includes transportation to Fondessy Landfill in Ohio which is an approved secure hazardous waste landfill. This landfill has been inspected by the Environmental Science Section of the Laboratory and meets all the criteria for approved disposal.

*Delia M. Christensen*  
Delia M. Christensen  
Chief Chemist  
Environmental Science

**ATTACHMENT III**

January 23, 1989

The Stanley Works  
P.O. Box 7000  
1000 Stanley Drive  
New Britain, CT 06050

Attention: Mr. John Caulkins

Gentlemen:

Re: Cost Estimate  
Post-Closure Ground Water  
Monitoring  
Fowlerville Facility

As you requested, Dames & Moore has estimated the cost for post-closure ground water monitoring for the former surface impoundments at the Fowlerville facility. In preparing the estimate, it has been assumed that six monitoring wells will be used to monitor the former impoundments. There will, of course, be additional wells at the site that will be used to monitor the possible effects of other solid waste management units. The cost of long-term monitoring of these wells, should they be required, has not be considered.

**COST ESTIMATE**

	Dollars
Heavy metals analysis (6 wells x 4/year x \$500/sample*)	12,000
Appendix IX parameters (6 wells x 1/year x \$3,000/sample*)	<u>18,000</u>
Annual Cost	30,000
Present worth of 30 years monitoring (assume 10 percent interest rate $30,000 \times 9.427$ )	282,810
say	300,000

\*Includes sampling, testing, and reporting of results.



DAMES & MOORE

A PROFESSIONAL LIMITED PARTNERSHIP

The Stanley Works  
January 23, 1989  
Page 2

We appreciate the opportunity to be of continuing service to Stanley. If you have any questions, please do not to hesitate to call.

Very truly yours,

DAMES & MOORE

Stuart Edwards, P.E.  
Partner (Ltd.)

SE:mdh  
P/R(23)(m)  
cc: Bill Guerrero ✓

**STANLEY****T H E   S T A N L E Y   W O R K S**

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

February 17, 1989

Mr. LeRoy Vahovick  
Michigan Department of Natural Resources  
State Secondary Complex  
General Office Building  
P.O. Box 30028  
Lansing, Michigan 30028

Re: Stanley Tools - Fowlerville, MI  
EPA ID# MID099124299  
Closure/Post-closure Care Cost  
Estimates

Dear Mr. Vahovick:

As requested enclosed please find a copy of the closure and post-closure care cost estimates prepared for the Stanley Tools - Fowlerville, Michigan facility. Stanley Tools is a division of The Stanley Works (Stanley). Stanley Tools discontinued manufacturing operations at the Fowlerville facility in 1985.

On October 7, 1985, Stanley Tools ceased adding waste to the surface impoundments and initiated closure of the impoundments under interim status guidelines.

The closure cost estimate indicated in the most recent financial test prepared by Stanley, to demonstrate Financial Assurance (responsibility) for liability coverage as well as closure and post-closure care costs, was derived from the summation of actual closure costs incurred to date multiplied by the GNP Implicit Price Deflator for the years 1986 and 1987. The post-closure care estimate was developed by our technical consultant Dames & Moore. That value is based upon the use of six wells to monitor the closed units for a variety of parameters on a quarterly basis over a thirty year time frame.

In our phone conversation and again in your letter you mention that Stanley must demonstrate Financial Assurance for closure and post-closure liability coverage in accordance with Part 7 of Michigan's Act 64 Administrative Rules.

Mr. Leroy Vahovick  
February 17, 1989  
Page Two

We have reviewed the information which you have provided on Part 7 Financial Capability and have concluded that Stanley is not subject to the financial capability requirements set forth in those rules. Subrule 2 of Rule 701 (R299.9701 Applicability) clearly states that "treatment, storage, or disposal facilities authorized to operate under these rules which have not yet been issued an operating license under the Act are not subject to this part."

As previously discussed, the Stanley Tools - Fowlerville facility has operated under interim status throughout its active life. A final operating permit (operating license) for the facility was never issued. Accordingly, the Stanley Tools - Fowlerville facility would appear to be expressly exempted from the requirements of Part 7, by Rule 701(2), and therefore subject to the Federal interim status financial assurance requirements only.

Our conclusion in this regard was confirmed by Jim Roberts of the Michigan DNR Hazardous Waste Management Division Central office via a telephone conversation on February 1, 1989.

If you have any further questions, however, or if you believe that additional action needs to be taken, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,



William J. Guerrero  
Corp. Environmental Specialist  
The Stanley Works  
Corporate Risk Management  
1000 Stanley Drive  
New Britain, CT 06050  
(203) 827-3802

cc: B.J. Bemben  
J.C. Calkins  
A.C. Hurley

\\fowl\mdnr\tfv026.wjg

LDF info

Region III Headquarters  
P.O. Box 30028, Lansing, MI 48909

January 30, 1989

Attention: William Guerrero  
The Stanley Works  
1000 Stanley Drive  
P.O. Box 7000  
New Britain, CT 06050

Re: MID 099124299

Dear Mr. Guerrero:

On January 30, 1989, staff of the Department of Natural Resources conducted a record review of your closure, post closure documents from your facility located at 425 Frank Street, in Fowlerville, Michigan.

This record review was done to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. Also, the groundwater monitoring program that is currently being conducted by your firm, was evaluated from the records in our Hazardous Waste Divisions Hydro-geo Unit and from their files. Attached is a copy of the report for your information.

As a result of that evaluation, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA, and Part 7 of the Act 64, Administration Rules (December 1988).

The letter submitted by your Chief Financial Officer must be to the Director of the Department of Natural Resources and worded as specified by the Director. The Stanley Works letter was to Mr. Valdez Adamkus, E.P.A. Region V. This letter was not worded as specified by the director. See the financial test provisions of Part 7 of the Act 64 Administrative Rules (enclosed).

1. 264.142(b) 264.144(b) The method of updating and re-calculating the cost of closure/post closure was not provided.

Act 64 Rule 299.9709 1(v) Requires that the total assets in Michigan excluding the value of land used for hazardous waste disposal be provided. This information was not provided.

Page Two  
January 30, 1989  
Mr. William Guerrero

We request that you respond, in writing, to this letter by February 20, 1989 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

*Leroy Vahovick*

WASTE MANAGEMENT DIVISION  
Lansing District  
Leroy Vahovick  
Env. Quality Analyst  
517-322-5104

LV:mj

Enclosure

**STANLEY**

# STANLEY TOOLS

DIVISION OF THE STANLEY WORKS

425 FRANK STREET, P. O. BOX 829, FOWLERVILLE, MICHIGAN 48836

March 14, 1986

Mr. Richard Traub

Technical, Permits and Compliance Section  
United States Environmental Protection Agency  
Region V  
230 South Dearborn Street  
Chicago, Ill. 60604

SOLID WASTE BRANCH  
U.S. EPA REGION V

MAR 18 1986

RECEIVED

(517) 223-9154

Dear Mr. Traub:

This letter is to inform you of the progress relative to removing the storage impoundments. The actual work of removal commenced on October 7, 1985. The first order of business was to insure the removal process would not cause further contamination. The liquid sludge was removed in an orderly professional manner and was complete in approximately 10 days. At this time the balance of impoundments including the vegetation, the exterior berms, interior walls and approximately 1' to 1 1/2' from the bottom was removed. The consistency of this material ranged from a solid to a slurry.

During both the pumping of the sludge and the removal of impoundment structure considerable rain hampered the operation. On several occasions it became necessary to halt operation in order to transfer the collected rain water to the waste water treatment system for treatment and discharge so the excavation equipment could re-enter impoundment area.

During November 1985 the weather became so inclement in terms of rain, operations had to cease. After the rain finally stopped cold weather set in, freezing the entrapped water and within a few days snow began to fall. Operations have not resumed as of this writing due to weather conditions. It has therefore been decided to wait until more favorable conditions are available which would most likely be in late May or June of 1986.

Currently Stanley Tools Division has expended \$563,830 for the work completed to this date. On December 1985 land fill cost escalated from \$50.00/yd. to \$100.00/yd. therefore increasing our cost for project completion. Stanley Tools has asked for an updated estimate for the completion of the project. Due to the increased land fill cost and the depth of contamination it will be necessary to expend an additional \$662,000 to finish this project.

Although we have not taken samples as required per the formal grid sampling format as required under RCRA we have however sampled the site randomly and feel it is fairly representative of the underlying conditions. (The grid sampling pattern will be utilized for final testing prior to certification.

223-97



— WORK SAFELY WITH HAND TOOLS — WEAR SAFETY GOGGLES —

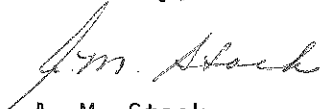
Enclosed is a copy of the background borings and a copy of the random samples which were taken at the time clean-up operations ceased. There is also a drawing indicating locations at which the random samples were taken. Level three of the Statistical Limits for clean standard is the level which we feel is most representative of the horizon which has been sampled via the random sample method.

During our discussions on clean standards you indicated that the department would be reasonable in reviewing the "how clean is clean" issue. After you have had an opportunity to review the excavation to date versus remaining contamination levels we would like to discuss with you a less stringent standard. Of the seven metals in question, only copper and chromium are slightly elevated above background borings. We are confident that these levels represent soil conditions that would not pose an environmental problem.

It is Stanley Tools Divisions intentions to co-operate with the Michigan DNR and the USEPA to work out an agreement environmentally and financially acceptable to all parties.

I trust you will give this your consideration. We would be willing to meet with you at your convenience if you desire.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. M. Stock".

A. M. Stock  
Manufacturing Manager

AMS/alk

Enc.

STATISTICAL LIMITS FOR CLEAN STANDARD

	<u>1 - 3 FT.</u>	<u>3 - 7 FT.</u>	<u>6.5' - 10'</u>	<u>Across Boring</u>
	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>All</u>
Ni	18.8	24.1	36.	24.
Co	8.2	11.	15.7	12.1
Zn	16.3	388.	300.	347.
Cu	12.	15.	23.	18.
Cd	1.65	1.5	2.	1.7
As	24.	3.2	4.9	12.6
Pb	20.8	23.7	31.	26.

Level 1 - Sample 1 - Borings 1, 2, & 3

Level 2 - Sample 2 - Borings 1, 2, & 3

Level 3 - Sample 3 - Borings 1, 2, & 3

All - Represents all samples, all borings

All results expressed in mg/kg.

NOTE: A = surface  
B = 1' below surface  
C = 2' below surface  
D = 3' below surface

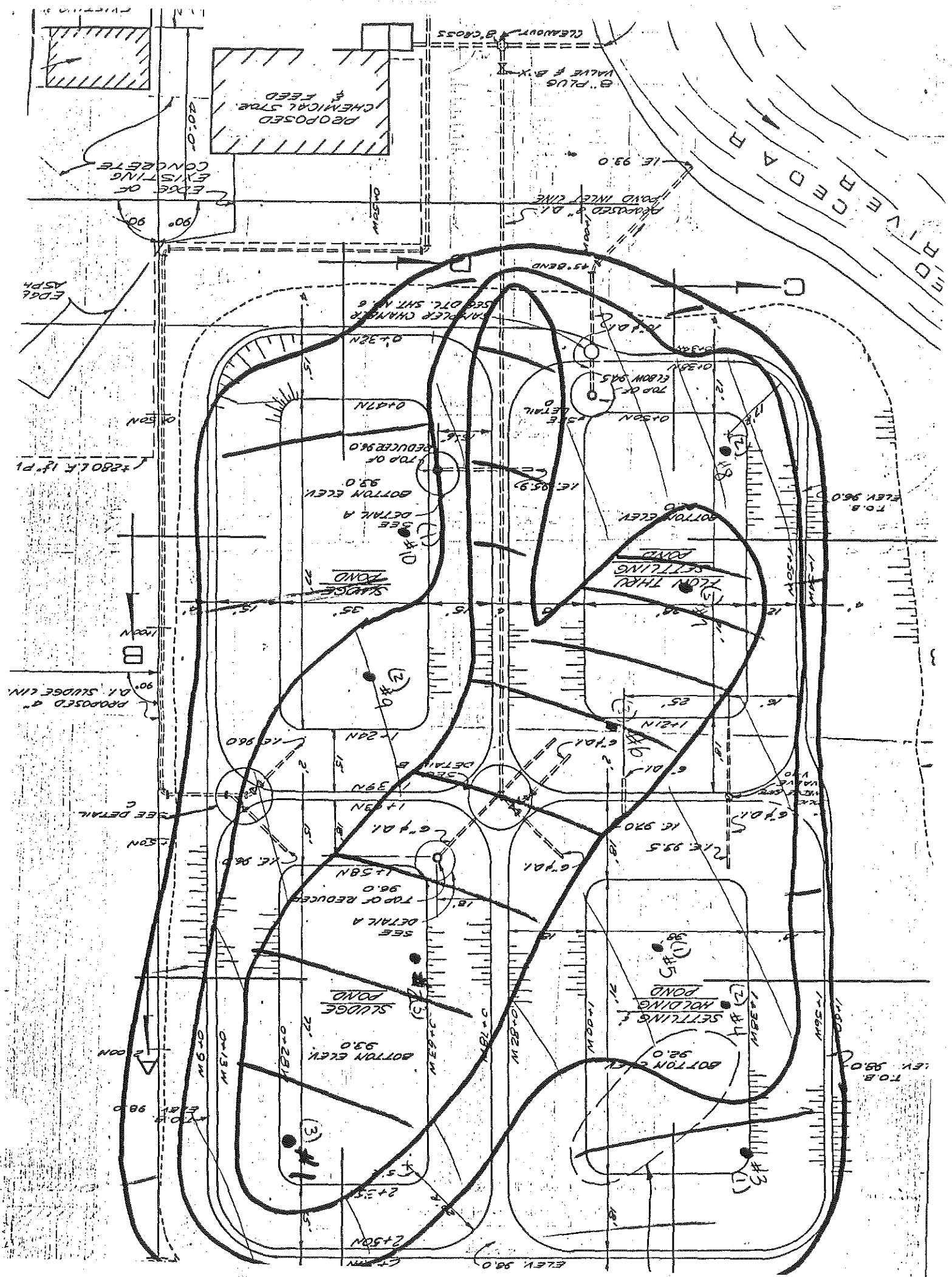
All sample results for Pb and Cd were less than detection limits.

Pb <5.0  
Cd <1.5

All results expressed in mg/kg.

Soil Analyses  
Stanley Tools Waverlyville

	<u>Cu</u>	<u>Zn</u>	<u>Ni</u>	<u>Cr</u>
1-A	29	66	22	25
1-B	11	44	15	10
1-C	21	30	17	14
1-D	16	23	18	17
2-A	84	102	44	32
2-B	49	43	20	17
2-C	27	37	33	16
2-D	23	25	19	14
3-A	24	22	33	7
3-B	16	29	14	6
3-C	11	19	19	10
3-D	10	16	12	8
4-A	116	110	93	128
4-B	54	54	13	27
4-C	23	29	75	19
4-D	14	15	15	6
5-A	8	23	8	5
5-B	26	41	20	17
5-C	14	15	15	6
5-D	11	18	10	8
6-A	780	163	10	182
6-B	12	32	17	12
6-C	44	38	23	21
6-D	21	12	13	11
7-A	84	108	53	62
7-B	23	38	17	11
7-C	71	54	43	18
7-D	50	27	15	14
8-A	37	44	27	33
8-B	80	70	32	36
8-C	19	28	37	12
8-D	11	17	15	10
9-A	88	13	8	10
9-B	31	10	7	5
9-C	31	12	10	5
9-D	16	17	7	8
10-A	35	62	17	20
10-B	24	22	7	8
10-C	15	20	7	8
10-D	18	17	10	6



M10099124299

The Stanley Works  
New Britain, Connecticut  
06050

ROBERT A. MACFARLANE  
SECRETARY and  
ASSOCIATE GENERAL COUNSEL

November 1, 1984

Mr. Valdaz Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Adamkus:

I enclose herewith the following:

1. A letter signed by the Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage for sudden and non-sudden accidental occurrences, closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.
2. A copy of the Annual Report of The Stanley Works for the latest completed fiscal year containing a certified public accountant's report on examination of the financial statements of The Stanley Works.
3. A special report from our independent certified public accountants stating that the data cited in the letter from the Chief Financial Officer and specified as having been derived from the independently audited year-end financial statements for the latest fiscal year have been compared with the amounts in such financial statements and that, in connection with the procedure, no matter came to the accountant's attention which caused him to believe that the specified data should be adjusted.

Very truly yours,

RECEIVED

NOV 2 1984

WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

jag  
Encls.

The Stanley Works  
New Britain, Connecticut

Mr. Valdaz Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Adamkus:

I am the Chief Financial Officer of The Stanley Works, 1000 Stanley Dr. New Britain, CT. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage for sudden and non-sudden accidental occurrences, closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Sudden and Non-Sudden Accidental Occurrences  
Stanley Tools - Fowlerville  
EPA ID# MID099124299  
425 Frank Street  
Fowlerville, Michigan 48836

Sudden Accidental Occurrences  
The Stanley Works - New Britain  
EPA ID# CTD010170363  
1000 Stanley Drive  
New Britain, Connecticut 06050

1. The owner or operator identified above owns or operates the following facility for which financial assurance or closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are:

Stanley Tools - Fowlerville  
EPA ID# MID099124299  
Closure Cost \$638,635

2. The owner or operator identified above guarantees through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for closure or post-closure care so guaranteed are shown for each facility: None

3. In the States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facility through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are:

The Stanley Works - New Britain  
EPA ID# CTD090170363  
Closure Cost - \$95,000

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test for any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility. None


This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on the Saturday closest to December 31st. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1983.

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$ <u>733,635</u>
2. Amount of annual aggregate liability coverage to be demonstrated	\$ <u>10,000,000</u>
3. Some of lines 1 and 2	\$ <u>10,733,635</u>
*4. Total liabilities	\$ <u>268,135,000</u>
*5. Tangible net worth	\$ <u>425,608,000</u>

*6. Net Worth	\$435,431,000	
*7. Current assets	\$403,589,000	
*8. Current liabilities	\$146,652,000	
9. Net working capital (line 7 minus line 8)	\$256,937,000	
*10. The sum of net income plus depreciation, depletion and amortization	\$ 88,391,000	
*11. Total assets in U. S.	\$557,652,000	
	Yes	No
12. Is line 5 at least \$10 million?	<u>X</u>	<u>          </u>
13. Is line 5 at least 6 times line 3?	<u>X</u>	<u>          </u>
14. Is line 9 at least 6 times line 3?	<u>X</u>	<u>          </u>
*15. Are at least 90% of assets located in the U.S.?	<u>          </u>	<u>          X          </u>
16. Is line 11 at least 6 times line 3?	<u>X</u>	<u>          </u>
17. Is line 4 divided by line 6 less than 2.0?	<u>X</u>	<u>          </u>
18. Is line 10 divided by line 4 greater than 0.1?	<u>X</u>	<u>          </u>
19. Is line 7 divided by line 8 greater than 1.5?	<u>X</u>	<u>          </u>

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
J. Spencer Gould  
Vice President, Finance

November 1, 1984  
\_\_\_\_\_  
Date

# Ernst & Whinney

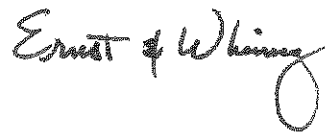
One Constitution Plaza  
Hartford, Connecticut 06103

203/247-3100

The Stanley Works  
1000 Stanley Drive  
New Britain, Connecticut  
06053

We have read the letter to the Environmental Protection Agency dated November 1, 1984 from the chief financial officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265, and have compared the data therein specified as having been derived from the independently audited financial statements of The Stanley Works for the fiscal year ended December 31, 1983 with the amounts in such financial statements.

In connection with that procedure, nothing came to our attention that caused us to believe that the specified data should be adjusted.

A handwritten signature in dark ink, appearing to read "Ernst & Whinney", with a large, stylized loop at the end.

Hartford, Connecticut  
November 2, 1984

## Supplemental Financial Information (Unaudited)

The Stanley Works and Subsidiaries

### Quarterly Results of Operations

(All amounts in thousands, except per share figures)

Quarter	Net Sales	Gross Profit	Selling, General and Administrative Expenses	Net Earnings	Net Earnings Per Share
<b>1983</b>					
First .....	\$225,712	\$ 63,414	\$ 51,993	\$ 6,002	\$ .22
Second .....	246,691	73,707	51,541	12,120	.44
Third .....	248,177	77,738	52,570	13,982	.51
Fourth .....	263,114	97,231	58,775	20,849	.75
Year .....	<u>\$983,694</u>	<u>\$312,090</u>	<u>\$214,879</u>	<u>\$52,953</u>	<u>\$1.92</u>
<b>1982</b>					
First .....	\$242,179	\$ 70,705	\$ 58,357	\$ 5,528	\$ .21
Second .....	246,488	72,114	56,831	7,925	.30
Third .....	239,192	72,910	52,995	11,631	.43
Fourth .....	234,919	73,774	50,939	12,417	.46
Year .....	<u>\$962,778</u>	<u>\$289,503</u>	<u>\$219,122</u>	<u>\$37,501</u>	<u>\$1.40</u>

Notes: Net earnings for the first quarter 1983 include \$1,487,000 (\$.05 per share) non-taxable gain on the exchange of Common Stock for debentures. Net earnings for the fourth quarter 1983 include a gain of approximately \$3,675,000, (\$.13 per share) from a reduction in LIFO inventories.

Net earnings for the third quarter 1982 include \$2,057,000 (\$.08 per share) non-taxable gain on the exchange of Common Stock and cash for debentures. Net earnings for the fourth quarter 1982 include a gain of approximately \$2,400,000 (\$.09 per share) from a reduction in LIFO inventories.

### Report for the Fourth Quarter

Net sales of \$263,114,000 for the fourth quarter of 1983 increased 12% from the same quarter of 1982. Net earnings were at record levels at \$20,849,000 (\$.75 per share), up 68% compared with 1982's fourth quarter of \$12,417,000 (\$.46 per share). The improved earnings are the result of higher sales as well as increased operating efficiencies. The fourth quarter of 1983 includes a gain of \$.13 per share on the reduction of LIFO inventories, as compared to a gain of \$.09 per share in 1982.

Consumer Products sales increased 3% over the fourth quarter of 1982, while operating profits were up 54%. Builders Products sales decreased 6% and operat-

ing profits decreased 8%, due primarily to lower commercial construction activity. Industrial Products sales increased 40% and operating profits increased 127%, from the low levels in the fourth quarter of 1982.

Fourth quarter sales and operating profits in the United States set new records, with sales up 16% and profits up 73% over the previous year. Canadian sales increased 27% and operating profits were twelve times 1982 levels. Sales and operating profits in other international areas declined 9% and 22%, respectively, as a result of weak economies and the effects of foreign currency translations.

---

Rental expense for all operating leases amounted to \$14,168,000 in 1983, \$15,819,000 in 1982 and \$15,279,000 in 1981. Sublease rental income and contingent rental expense were not material.

**NOTE L—Operations by Industry Segment and Geographic Area**

Industry Segment and Geographic Area information included on pages 24 and 25 of this report is an integral part of the financial statements.

---

## **Report of Ernst & Whinney, Independent Auditors**

To the Stockholders  
The Stanley Works  
New Britain, Connecticut

We have examined the consolidated balance sheets of The Stanley Works and subsidiaries as of December 31, 1983 and January 2, 1983, and the related consolidated statements of earnings, changes in stockholders' equity and changes in financial position for each of the three fiscal years in the period ended December 31, 1983. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

Hartford, Connecticut  
February 7, 1984

In our opinion, the financial statements referred to above present fairly the consolidated financial position of The Stanley Works and subsidiaries at December 31, 1983 and January 2, 1983, and the consolidated results of their operations and changes in their financial position for each of the three fiscal years in the period ended December 31, 1983, in conformity with generally accepted accounting principles applied on a consistent basis.

*Ernst & Whinney*

28 AUG 1984

Mr. Robert A. Macfarlane  
Secretary and Associate  
General Counsel  
The Stanley Works  
New Britain, Connecticut 06050

Re: Stanley Tools - Fowlerville  
MID 099124299

Dear Mr. Macfarlane:

This letter is to acknowledge receipt of your Auditor's Report which satisfies the requirement of RCRA Interim Status Standards for Financial Responsibility, 40 CFR 265.143(e)(iii).

We appreciate your cooperation in this matter.

Sincerely,

Goldie E. Seals  
Environmental Protection Specialist

5HW-13:GSEALS:mh:3-1429:8-27-84:1

[illegible]

5HW-13

Mr. Robert A. Macfarlane  
Secretary and Associate  
General Counsel  
The Stanley Works  
New Britain, Connecticut 06050

Re: Stanley Tools - Fowlerville  
MID 099124299

Dear Mr. Macfarlane:

This letter is to acknowledge receipt of your Auditor's Report on  
examination of the financial statement which satisfies the requirement.

We appreciate your cooperation in this matter.

Sincerely,

Goldie E. Seals  
Environmental Protection Specialist

5HW-13:GSEALS:mh:3-1429:8-23-84

*CP 8-24-84*

INITIALS	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
	711H	GES			Wey 8/24/84			
DATE	8-23-84	8/24/84						



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

JUL 18 1984

5HW-13

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Robert A. Macfarlane  
Secretary and Associate  
General Counsel  
The Stanley Works  
New Britain, Connecticut 06050

Re: Stanley Tools - Fowlerville  
MID099124299

Dear Mr. Macfarlane:

The above named facility is a hazardous waste treatment, storage or disposal facility under the Resource Conservation and Recovery Act, as amended (RCRA). The above facility is subject to financial responsibility requirements as provided in 40 CFR 265 Subpart H.

Please submit the Auditor's Report on examination of the financial statements for the latest completed fiscal year as it was not enclosed with your March 23, 1984, letter. Please forward this report within 30 days to:

RCRA Activities  
Attn: Financial Requirements  
c/o Goldie E. Seals  
P.O. Box A3587  
Chicago, Illinois 60690

If additional information is required, please contact Goldie E. Seals, of my staff, at (312) 353-1429.

Sincerely,

William H. Miner, Chief  
Technical, Permits and Compliance Section

RECEIVED  
AUG 06 1984  
WMD-RAIU  
EPA, REGION V

JUL 18 1984

5HW-13

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Robert A. Macfarlane  
Secretary and Associate  
General Counsel  
The Stanley Works  
New Britain, Connecticut 06050

Re: Stanley Tools - Fowlerville  
MID099124299

Dear Mr. Macfarlane:

The above named facility is a hazardous waste treatment, storage or disposal facility under the Resource Conservation and Recovery Act, as amended (RCRA). The above facility is subject to financial responsibility requirements as provided in 40 CFR 265 Subpart H.

Please submit the Auditor's Report on examination of the financial statements for the latest completed fiscal year as it was not enclosed with your March 23, 1984, letter. Please forward this report within 30 days to:

RCRA Activities  
Attn: Financial Requirements  
c/o Goldie E. Seals  
P.O. Box A3587  
Chicago, Illinois 60690

If additional information is required, please contact Goldie E. Seals, of my staff, at (312) 353-1429.

Sincerely,

ORIGINAL SIGNED BY  
WILLIAM H. MINER  
William H. Miner, Chief  
Technical, Permits and Compliance Section

bcc: T. Golz  
O. Warnsley  
M. Villarreal

5HW-13:GESEALS:ap:3-1429:7-17-84

	TYPIST	AUTHOR	STU #1	STU #2	STU #3	TPS	WMB	WMF
INITIALS	Cap	ges	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	Dir
DATE	7-17-84	7-17-84			WEM 7/17/84	WMB 7/18/84		

RMR 7/18

Attachment D

Inspection Priorities For RCRA Interim Status Financial Responsibility Requirements

265.140(c) Is this a State or Federal Facility? *No*

FINANCIAL ASSURANCE REQUIREMENTS

265.142(a) Is the written closure cost estimate available? *Yes*

265.144(a) Is the written post-closure cost estimate available? *Yes*

265.142(c) Have any revisions been made to the closure/post-closure cost estimates which increase the cost of closure/post-closure? *No*

265.142(d) Have the closure/post-closure cost estimates been revised to reflect the increased cost of closure/post-closure? *Yes*

265.142(b) Have the closure/post-closure cost estimates been updated to the current year by either recalculating the cost estimates or using an inflation factor derived from the most recent Implicit Price Deflator from the U.S. Department of Commerce?

Note: The annual Implicit Price Deflator covers the period from April 1987 to April 1988 (for example) and can be obtained from the Commerce Department Library in Chicago, (312) 363-4450.

1980 - 85.7	1984 - 108.1
1981 - 97.0	1985 - 111.7
1982 - 100.0 base year	1986 - 114.6
1983 - 103.8	1987 - 116.4

265.143 Which financial instrument(s) is used to assure closure/post-closure care costs?

Closure

Post-Closure

☐ Trust Fund \*

☐ Trust Fund \*

☐ Surety Bond\*

☐ Surety Bond\*

☐ Letter of Credit\*

☐ Letter of Credit\*

☐ Insurance\*

☐ Insurance\*

☒ Financial Test

☒ Financial Test

☐ Corporate Guarantee

☐ Corporate Guarantee

265.143(f) ☐ Combination of above\*

☐ Combination of above\*

265.145(f) Specify:

Specify:

265.143(g) ☐ One instrument for multiple facilities specify:

☐ One instrument for multiple facilities specify:

- 265.146 Has the owner or operator used one instrument for financial assurance of both closure and post-closure care? *Yes*
- 265.142 Does the amount of the financial assurance instrument(s) equal *Yes*  
265.144 or exceed the current closure/post-closure cost estimates?
- 265.150 Has the State assumed responsibility for the facility's compliance with closure/post-closure care requirements? *No*

#### LIABILITY REQUIREMENTS

- 265.147(a) Does the owner or operator have coverage for sudden accidental occurrences in an amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs? *Yes*

265.147(a) What is the method of coverage?

- ☐ Insurance
- ☐ Hazardous Waste Facility Endorsement, or
- ☐ Certificate of Liability Insurance
- ☒ Financial test
- ☐ Corporate Guarantee
- ☐ Combination of financial test or corporate guarantee and insurance

- 265.147(b) Does the owner or operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste have coverage for nonsudden accidental occurrences in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million, exclusive of legal defense costs?

265.147(b) What is the method of coverage?

- ☐ Insurance
- ☐ Hazardous Waste Facility Liability Endorsement, or
- ☐ Certificate of Liability Insurance
- ☒ Financial test
- ☐ Corporate guarantee
- ☐ Combination of financial test or corporate guarantee and insurance

- 265.147(e) After receiving final closure certifications from the owner or operator and an independent registered professional engineer, has the Director notified the owner or operator in writing that the owner or operator is no longer required to maintain liability coverage? *NA*
- 265.150 Has the State assumed responsibility for the owner's or operator's compliance with the liability requirements for sudden and/or nonsudden accidental occurrences? *No*

Depending on the division of responsibility between the district offices and the central office in Lansing, the following may apply to a CEI inspection:

- 265.143 Does the wording of all financial instrument(s) match that *No*
- 265.145 in 264.151 and identify the Director of MDNR rather than the U.S. EPA Regional Administrator?
- 265.143(a) Are the closure/post-closure cost estimates calculated according to *?*
- 265.145(a) Federal and State requirements?
- 265.143 Have the procedures regarding the financial instrument(s) been
- 265.145 followed?

The Stanley Works

New Britain, Connecticut

06050

ROBERT A. MACFARLANE

SECRETARY and

ASSOCIATE GENERAL COUNSEL

March 23, 1984

Mr. Valdaz Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Adamkus:

I enclose herewith the following:

1. A letter signed by the Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage for sudden and non-sudden accidental occurrences, closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.
2. A copy of the Annual Report of The Stanley Works for the latest completed fiscal year containing a certified public accountant's report on examination of the financial statements of The Stanley Works.
3. A special report from our independent certified public accountants stating that the data cited in the letter from the Chief Financial Officer and specified as having been derived from the independently audited year-end financial statements for the latest fiscal year have been compared with the amounts in such financial statements and that, in connection with the procedure, no matter came to the accountant's attention which caused him to believe that the specified data should be adjusted.

RECEIVED

MAR 27 1984

WASTE MANAGEMENT  
BRANCH

Very truly yours,



RAM:jdq

MID -0991261 299  
Major, Paul B

The Stanley Works  
New Britain, Connecticut  
06050

Mr. Valdaz Adamkus  
EPA Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Adamkus:

I am the Chief Financial Officer of The Stanley Works, 195 Lake Street, New Britain, CT. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage for sudden and non-sudden accidental occurrences, closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Sudden and Non-Sudden Accidental Occurrences  
Stanley Tools - Fowlerville  
EPA ID# MID099124299  
425 Frank Street  
Fowlerville, Michigan 48836

Sudden Accidental Occurrences  
The Stanley Works - New Britain  
EPA ID# CTD010170363  
195 Lake Street  
New Britain, Connecticut 06050

1. The owner or operator identified above owns or operates the following facility for which financial assurance or closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are:

Stanley Tools - Fowlerville  
EPA ID# MID099124299  
Closure Cost \$205,620

2. The owner or operator identified above guarantees through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for closure or post-closure care so guaranteed are shown for each facility: None

3. In the States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facility through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H or 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are:

The Stanley Works - New Britain  
EPA ID# CTD090170363  
Closure Cost - \$95,000

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test for any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility. None


This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on the Saturday closest to December 31st. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1983.

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$ <u>300,620</u>
2. Amount of annual aggregate liability coverage to be demonstrated	\$ <u>10,000,000</u>
3. Some of lines 1 and 2	\$ <u>10,300,620</u>
*4. Total liabilities	\$ <u>268,135,000</u>
*5. Tangible net worth	\$ <u>425,608,000</u>

*6. Net Worth	\$435,431,000	
*7. Current assets	\$403,589,000	
*8. Current liabilities	\$146,652,000	
9. Net working capital (line 7 minus line 8)	\$256,937,000	
*10. The sum of net income plus depreciation, depletion and amortization	\$ 88,391,000	
*11. Total assets in U. S.	\$557,652,000	
	Yes	No
12. Is line 5 at least \$10 million?	<u>X</u>	<u>          </u>
13. Is line 5 at least 6 times line 3?	<u>X</u>	<u>          </u>
14. Is line 9 at least 6 times line 3?	<u>X</u>	<u>          </u>
*15. Are at least 90% of assets located in the U.S.?	<u>          </u>	<u>          X          </u>
16. Is line 11 at least 6 times line 3?	<u>X</u>	<u>          </u>
17. Is line 4 divided by line 6 less than 2.0?	<u>X</u>	<u>          </u>
18. Is line 10 divided by line 4 greater than 0.1?	<u>X</u>	<u>          </u>
19. Is line 7 divided by line 8 greater than 1.5?	<u>X</u>	<u>          </u>

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
J. Spencer Gould  
Vice President, Finance

March 23, 1984  
Date

# Ernst & Whinney

One Constitution Plaza  
Hartford, Connecticut 06103

203/247-3100

The Stanley Works  
195 Lake Street  
New Britain, Connecticut  
06050

We have read the letter to the Environmental Protection Agency dated March 23, 1984 from the chief financial officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265, and have compared the data therein specified as having been derived from the independently audited financial statements of The Stanley Works for the fiscal year ended December 31, 1983 with the amounts in such financial statements.

In connection with that procedure, nothing came to our attention that caused us to believe that the specified data should be adjusted.

*Ernst & Whinney*

Hartford, Connecticut  
March 23, 1984

MID 099 124 299  
MID 099 124 299

The Stanley Works  
New Britain, Connecticut  
06050

ROBERT A. MACFARLANE  
SECRETARY and  
ASSOCIATE GENERAL COUNSEL

May 20, 1983

Mr. Valdaz Adamkus  
EPA Region V  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Adamkus:

I enclose herewith the following:

1. A letter signed by the Chief Financial Officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage for non-sudden accidental occurrences as specified in sub-part H of 40 CFR, Parts 264 and 265;
2. A copy of the Annual Report of The Stanley Works for the latest completed fiscal year containing a certified public accountant's report on examination of the financial statements of The Stanley Works;
3. A special report from our independent certified public accountants stating that the data cited in the letter from the Chief Financial Officer and specified as having been derived from the independently audited year end financial statements for the latest fiscal year have been compared with the amounts in such financial statements and that, in connection with that procedure, no matter came to the accountant's attention which caused him to believe that the specified data should be adjusted.

Very truly yours,



RAM/aem

RECEIVED  
MAY 24 1983

WASTE MANAGEMENT  
BRANCH

The Stanley Works  
New Britain, Connecticut  
08600

May 20, 1983

Mr. Valdaz Adamkus  
EPA Region V  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Adamkus:

I am the Chief Financial Officer of The Stanley Works, 195 Lake Street, New Britain, Connecticut. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage for non-sudden accidental occurrences as specified in subpart H of 40 CFR, Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facility for which liability coverage is being demonstrated through the financial test specified in subpart H of 40 CFR, Parts 264 and 265.

Hand Tools - Fowlerville  
EPA ID #MID099124299  
425 Frank Street  
Fowlerville, Michigan 48836

This owner or operator is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on the Sunday closest to December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year ended January 2, 1983.

1. Amount of Annual Aggregate Liability Coverage to be demonstrated.	\$ 6,000,000
*2. Current Assets.	369,838,000
*3 Current Liabilities	129,489,000
4. Net Working Capital (Line 2 minus Line 3).	240,349,000
*5. Tangible Net Worth	385,158,000


\*6. If less than 90% of assets are located in the U.S., give total U.S. Assets.

\$490,932,000

	YES	NO
7. Is Line 5 at least \$10,000,000?	<u>X</u>	___
8. Is Line 4 at least 6 times Line 1?	<u>X</u>	___
9. Is Line 5 at least 6 times Line 1?	<u>X</u>	___
*10. Are at least 90% of assets located in U.S.? If not, complete Line 11.	___	<u>X</u>
11. Is Line 6 at least 6 times Line 1?	<u>X</u>	___

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.

DATE: May 20, 1983

  
\_\_\_\_\_  
J. Spencer Gould  
Chief Financial Officer and  
Vice President-Finance

Ernst & Whinney

One Constitution Plaza  
Hartford, Connecticut 06103

203/247-3100

The Stanley Works  
195 Lake Street  
New Britain, Connecticut 06050

We have read the letter to the Environmental Protection Agency dated May 20, 1983 from the chief financial officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage for non-sudden accidental occurrences as specified in Subpart H of 40 CFR Parts 264 and 265, and have compared the data therein specified as having been derived from the independently audited financial statements of The Stanley Works for the fiscal year ended January 2, 1983 with the amounts in such financial statements.

In connection with that procedure, nothing came to our attention that caused us to believe that the specified data should be adjusted.

*Ernst & Whinney*

Hartford, Connecticut  
May 20, 1983

**STANLEY**

## INTER-OFFICE CORRESPONDENCE

**STANLEY**

TO: Mr. A. M. Stock

FORM 1069 - L

DATE August 4, 1982

CC: Mr. E. A. Carpentier  
Mrs D. M. Yarena  
Mr. D. C. YoungSUBJECT: Tools - Fowlerville  
Pollution Control  
Financial Liability Assurance

Mike,

Enclosed are copies of the letters sent to the E.P.A.'s Region V Regional Administrator, Mr. Valdez Adamkus on July 8, 1982. One letter demonstrates financial responsibility, (assurance) for liability coverage, and closure and/or post-closure care using the Financial Test in accordance with subpart H of Title 40CFR parts 264 and 265. The other is one from an independent certified public accountant stating that the data cited in the letter demonstrating financial responsibility is in agreement with his audit. Also sent but not enclosed is a copy of the Annual Report of the Stanley Works.

The letter demonstrating financial responsibility was actually due on July 6th but due to a misinterpretation at Mr. MacFarlane's office, the letter was sent out 2 days later.

Please keep these copies on file at your plant.

William J. Guerrero  
Stanley Laboratory

The Stanley Works  
New Britain, Connecticut  
06050

ROBERT A. MACFARLANE  
SECRETARY and  
ASSOCIATE GENERAL COUNSEL

July 8, 1982

Mr. Valdaz Adamkus  
EPA Region V  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Adamkus:

I enclose herewith the following:

1. a letter signed by the chief financial officer of The Stanley Works submitted in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in subpart H of 40CFR parts 264 and 265;
- ? 2. a copy of the Annual Report of The Stanley Works for the latest completed fiscal year containing a certified public accountant's report on examination of the financial statements of The Stanley Works;
- ? 2. a special report from our independent certified public accountants stating that the data cited in the letter from the chief financial officer and specified as having been derived from the independently audited year-end financial statements for the latest fiscal year have been compared with the amounts in such financial statements and that, in connection with that procedure, no matter came to the accountant's attention which caused him to believe that the specified data should be adjusted.

Very truly yours,



RAM/aem

Enc.

**The Stanley Works**

New Britain, Connecticut

ns050

July 8, 1982

Mr. Valdaz Adamkus  
EPA Region V  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Adamkus:

I am the chief financial officer of The Stanley Works, 195 Lake Street, New Britain, Connecticut. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

(a) Hand Tools - Fowlerville

EPA ID# MID099124299  
Closure Cost - \$185,000  
Regional Administrator  
Mr. Valdaz Adamkus  
Regional Administrator Address  
EPA Region V  
230 South Dearborn  
Chicago, Illinois 60604

(b) The Stanley Works - New Britain

EPA ID# CTD010170363  
Closure Cost - To be provided by R. C. Sprong  
Regional Administrator  
Mr. Lester A. Sutton  
Regional Administrator Address  
EPA Region I  
Waste Management Division  
Room 1903  
JFK Building  
Boston, Massachusetts 02203

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR

Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: None

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

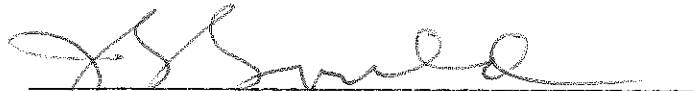
This owner or operator is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on the Sunday closest to December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year ended January 3, 1982.

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$ <u>365,000</u>
2. Amount of annual aggregate liability coverage to be demonstrated	\$ <u>4,000,000</u>
3. Sum of lines 1 and 2.	\$ <u>4,365,000</u>
*4. Total liabilities	\$ <u>282,371,000</u>
*5. Tangible net worth	\$ <u>381,767,000</u>
*6. Net Worth	\$ <u>384,099,000</u>
*7. Current assets	\$ <u>418,124,000</u>
*8. Current liabilities	\$ <u>169,521,000</u>
9. Net working capital (line 7 minus line 8)	\$ <u>248,603,000</u>

*10. The sum of net income plus depreciation, depletion and amortization.	\$	<u>83,946,000</u>
*11. Total assets in U.S.	\$	<u>481,338,000</u>
	Yes	No
12. is line 5 at least \$10 million?	<u>X</u>	_____
13. is line 5 at least 6 times line 3?	<u>X</u>	_____
14. is line 9 at least 6 times line 3?	<u>X</u>	_____
*15. Are at least 90% of assets located in the U.S.?	_____	<u>X</u>
16. is line 11 at least 6 times line 3?	<u>X</u>	_____
17. is line 4 divided by line 6 less than 2.0?	<u>X</u>	_____
18. is line 10 divided by line 4 greater than 0.1?	<u>X</u>	_____
19. is line 7 divided by line 8 greater than 1.5?	<u>X</u>	_____

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
J. Spencer Gould  
Vice President, Finance

July 8, 1982  
Date

# Ernst & Whinney

One Constitution Plaza  
Hartford, Connecticut 06103

203/247-3100

The Stanley Works  
195 Lake Street  
New Britain, Connec

We have read the letter from the Environmental Protection Agency dated July 1, 1982, in support of the use of the financial test to allocate financial responsibility for liability coverage and/or post-closure care as specified in 40 CFR Parts 264 and 265, and have compared the independently audited financial statements of The Stanley Works for the fiscal year ended January 3, 1982 with the amounts in such financial statements.

In connection with the procedure, nothing came to our attention that would lead us to believe that the specified data should be adjusted.

*Ernst & Whinney*

Hartford, Connecticut  
July 8, 1982